

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT, LLC, ET AL., ¹	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

**THIRD INTERIM APPLICATION FOR ALLOWANCE OF LEGAL FEES AND EXPENSES
FOR PULMAN, CAPPuccio & PULLEN, LLP, AS COUNSEL TO THE TRUSTEE
FOR THE TIME PERIOD OF OCTOBER 1, 2022 TO JANUARY 31, 2023**

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS
FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN
MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE
HELD.**

Name of Applicant:		Randall A. Pulman Pulman Cappuccio & Pullen, LLP
Applicant's professional role in case		Counsel for the Chapter 7 Trustee
Indicate whether this is an interim or final application		Interim
Date Order of Appointment filed		01/20/2022 [ECF No. 48]
Effective Date of Appointment		12/20/2021
	Beginning of Period	Ending of Period
Total period covered in application	10/01/2022	01/31/2023
Time periods covered by any prior applications	12/15/2021	09/30/2022

¹ The Jointly Administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a "**Bankruptcy Estate**" and collectively, "**Bankruptcy Estates**".

Total amounts awarded in all prior applications	\$521,327.79
Amount of retainer received in the case	\$0.00
Amount of credit applied by PC&P to fees	\$7,000.00
Total fees applied for in the Third Fee Application and in all prior applications (including any retainer amounts or credits applied or to be applied)	\$810,873.50
Total fees applied for in the Third Fee Application (including any retainer amounts or credits to be applied)	\$324,644.00
Total professional fees requested in the Third Fee Application	\$324,644.00
Total professional hours covered by the Third Fee Application	1063.20
Reimbursable expenses sought in the Third Fee Application	\$29,860.29
Application Cost	Approximately \$10,000.00

TO THE HONORABLE MICHAEL M. PARKER, UNITED STATES BANKRUPTCY JUDGE:

Pulman, Cappuccio & Pullen, LLP (“**PC&P**”), attorneys for John Patrick Lowe, Chapter 7 Trustee (“**Trustee**”) for the bankruptcy estates of deeproot Capital Management, LLC, Policy Services, Inc., Wizard Mode Media, LLC, deeproot Pinball LLC, deeproot Growth Runs Deep Fund, LLC, deeproot 575 Fund, LLC, deeproot 3 Year Bonus Income Debenture Fund, LLC, deeproot Bonus Growth 5 Year Debenture Fund, LLC, deeproot Tech LLC, deeproot Funds LLC, deeproot Studios LLC (each a “**Debtor**” and collectively, the “**Debtors**”), being jointly administered under lead case *In re: deeproot Capital Management, LLC*, Case No. 21-51523, hereby files this *Third Interim Application for Allowance of Hourly Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of October, 1, 2022 to January 31, 2023* (“**Third Fee Application**”), for allowance of compensation of \$324,644.00 in fees and reimbursement of expenses of \$29,860.29, for a total of \$354,504.29, for the time period of October 1, 2022 to January 31, 2023. In support of the Third Fee Application, PC&P respectfully asks the Court to approve and authorize this Third Fee Application, based on the following:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over this Third Fee Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue for this case is proper in the Western District of Texas under 28 U.S.C. §§ 1408 and 1409. This is a core proceeding under 28 U.S.C. § 157(b)(2).

2. On December 9, 2021, (the “**Petition Date**”), the Debtors filed voluntary petitions under Chapter 7 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “**Bankruptcy Code**”) [ECF No. 1]. The Court, by its Order entered December 21, 2021, authorized that the Debtors’ bankruptcy cases be jointly administered under lead case *In re: deeproot Capital Management, LLC*, Case No. 21-51523 (the “**Jointly Administered Case**”) [ECF No. 20].

3. On or about December 21, 2021, John Patrick Lowe was duly appointed as Trustee.

4. The statutory predicates for the relief sought by this Third Fee Application are sections 328(a) and 331 of the Bankruptcy Code.

5. A copy of the proposed order in conformity with Local Rule 9013 is attached as Exhibit A.

6. A copy of the Summary of the Third Fee Application is attached as Exhibit B.

II. FACTUAL AND PROCEDURAL BACKGROUND

7. The Debtors in this Jointly Administered Case are entities through which the Debtors’ principal, Mr. Robert Mueller (“**Mueller**”) ran a Ponzi scheme. Mueller controlled, as the sole owner, officer and director of each of the Debtors, all of their operations. Upon information and belief, Mueller raised, on behalf of the Debtors, in excess of \$70,000,000 from individual investors over the past decade.

8. Initially, Mueller raised monies from individual investors through Debtor, Policy Services, Inc. (“**PSI**”), by purportedly selling fractional interests in the death benefits payable on life insurance policies (the “**Policies**”) purchased by PSI. These fractional interests in the Policies are known as life settlements. *See Life Partners, Inc. v. Arnold*, 464 S.W.3d 660, 662 (Tex. 2015).

9. In or around 2015, Mueller stopped raising investor money directly through PSI and began to raise investor money primarily, though not exclusively, through two of the other Debtors, deeproot Growth Runs Deep Fund, LLC, and deeproot 575 Fund, LLC (the “**Funds**”). After Mueller switched to raising monies through the Funds, the investment pitch varied over time, but essentially investors were promised a guaranteed annual return of 5% to 7% payable at the end of the applicable investment period. Investors purchased debentures—or long-term unsecured obligations—to pay. Mueller marketed the Funds as having investments in life settlements, agriculture, real estate, and sports and entertainment businesses. In 2017, invested monies, by way of intercompany transfers to deeproot Pinball, LLC, deeproot Studios, LLC, deeproot Tech, LLC, and Wizard Mode Media, LLC, were used to support Mueller’s ultimately unsuccessful effort to develop and manufacture state of the art pinball machines. The Debtors’ pre-petition financial statements and each of the Debtors’ respective schedules reflect that none of the Debtors generated any net income and, in most cases, had no revenue at any time. Despite the lack of revenue and net income, the Debtors did return investments to some of the investors.

10. On or about August 20, 2021, the United States Securities and Exchange Commission (the “**SEC**”) filed suit² against Debtors Policy Services, Inc. and deeproot Funds, LLC, and Mueller individually, for violations of federal securities law, and named Mueller’s immediate family members, Jeffery L. Mueller and Belinda B. Breen, as relief parties (the “**SEC**

² *Securities and Exchange Commission v. Robert J. Mueller, et al.*, Civil Action No. 5:21-cv-785, U.S. Dist. Ct. for the W. Dist. Of Texas, San Antonio Division.

Civil Action”). An injunction was entered prohibiting the solicitation of additional funds. Shortly thereafter, on December 9, 2021, chapter 7 bankruptcy petitions were filed for each of the Debtors.

11. On January 20, 2022, the Court entered its *Order on the Application of Trustee to Employ Counsel* (the “**Employment Order**”), wherein the Court authorized the Trustee to employ PC&P as counsel [ECF No. 48]. The Employment Order permits PC&P to seek interim compensation as provided in 11 U.S.C. §331, subject to approval by this Court. A copy of the Employment Order is attached hereto as Exhibit C.

12. On May 13, 2022, PC&P filed its *First Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of December 15, 2021 to April 30, 2022*, with the Court (“**First Fee Application**”). [ECF No. 111].

13. On June 9, 2022, the Court entered its *Order Granting First Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of December 15, 2021 to April 30, 2022*, authorizing the Trustee to pay to PC&P as an administrative expense, hourly fees in the amount of \$226,982.50 and expenses in the amount of \$28,952.54 from the Bankruptcy Estate accounts of the Debtors as designated in the Court’s Order. [ECF No. 125].

14. On October 31, 2022, PC&P filed its *Second Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of May 1, 2022 to September 30, 2022*, with the Court (“**Second Fee Application**”). [ECF No. 189].

15. On December 6, 2022, the Court entered its *Order Granting Second Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as*

Counsel to the Trustee for the Time Period of May 1, 2022 to September 30, 2022, authorizing the Trustee to pay to PC&P as an administrative expense, hourly fees in the amount of \$259,247.00 and expenses in the amount of \$6,145.75 from the Bankruptcy Estate accounts of the Debtors as designated in the Court's Order. [ECF No. 211].

III. APPLICATION FOR HOURLY SERVICES

16. PC&P has provided legal services and expended 1063.20 hours from October 1, 2022 to January 31, 2023 (the "**Application Period**"), totaling \$331,644.00 in fees representing the Trustee. The average hourly rate for this fee application was \$311.93 per hour. Randall A. Pulman has exercised some judgement in reviewing and approving this fee application and has issued a billing judgment credit of \$7,000.00, thus reducing the total amount of professional fees applied for in the Third Fee Application to \$324,644.00.

17. During this four month Application Period, lawyers from PC&P on behalf of the Trustee:

- a) Completed sale transactions which were negotiated and approved by the Court during the initial ten months of the case;
- b) Filed approximately thirty-seven adversary complaints on avoidance actions against the Finders and the Net Winners;
- c) Brought suit against Robert J. Mueller to recover monies wrongfully transferred out of the Estates;
- d) Negotiated settlements with Net Winners, Finders, vendors, and a landlord of the Debtors;
- e) Investigated numerous claims against Finders and vendors of Debtors; and
- f) Communicated and negotiated with attorneys for the United States Department of Justice and the Securities and Exchange Commission.

18. Below is a chart summarizing fees, expenses and hours expended in the Bankruptcy

Case by PC&P by matter number.

PC&P Matter No.	Matter Description	Debtor Estate	Fees	Expenses	Hours
1934.001	Main Bankruptcy Case	Wizard Mode Media, LLC, Case No. 21-51514	\$3,125.00	\$0.00	7.90
		Policy Services, Inc. Case No. 21-51513	\$74,210.50	\$967.38	244.00
1934.002	SEC Matter	deeproot Funds, LLC, Case No. 21-51521	\$13,460.00	\$1,001.84	33.60
1934.003	CCW Matter	deeproot Funds, LLC, Case No. 21-51521	\$4,200.00	\$22.00	10.30
1934.004	Ohana Matter	Policy Services, Inc., Case No. 21-51513	\$3,095.00	\$40.74	7.00
1934.005	Cycladic Matter	Policy Services, Inc., Case No. 21-51513	\$44,786.00	\$7,975.33	135.80
1934.006	Winn Matter	Policy Services, Inc., Case No. 21-51513	\$3,372.50	\$27.00	9.10
1934.007	Mueller Matter	Policy Services, Inc., Case No. 21-51513	\$26,180.00	\$350.00	68.00
1934.008	Net Winners Matter	Policy Services, Inc., Case No. 21-51513	\$18,912.5	\$568.00	60.00
1934.009	Nationwide Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.0
1934.010	Pinball Matter	deeproot Tech, LLC, Case No. 21-51520	\$17,800.00	\$3,451.01	46.00
1934.011	Finders Matter	Policy Services, Inc., Case No. 21-51513	\$8,462.50	\$975.00	25.30
1934.012	Financial Horizons Concepts Finder	Policy Services, Inc., Case No. 21-51513	\$3,132.50	\$350.00	10.00
1934.013	Kenneth & Brownie Martin Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$790.00	\$0.00	2.30
1934.014	David & Mary Medlang Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$7,222.50	\$2,079.68	23.40
1934.015	Financial Partners of America Finder	Policy Services, Inc., Case No. 21-51513	\$2,877.50	\$375.92	11.70
1934.016	INF Solutions LLC Finder	Policy Services, Inc., Case No. 21-51513	\$2,747.50	\$350.00	8.60
1934.017	GM Consultants Group Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$2,062.50	\$383.88	8.90
1934.018	Candice Gillen Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$900.00	\$0.00	2.70

1934.019	Alice Snell Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,160.00	\$0.00	3.40
1934.020	Carl & Paula Jarnecke/Trust Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$890.00	\$0.00	2.50
1934.021	D. Stien/Fidelity Mutual Finder	Policy Services, Inc., Case No. 21-51513	\$2,652.50	\$376.40	11.50
1934.022	McNamara Cap. Investmt Grp Finder	Policy Services, Inc., Case No. 21-51513	\$2,652.50	\$350.00	8.50
1934.023	PGH Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$15,180.00	\$350.00	44.90
1934.024	Jacob Proux Finder	Policy Services, Inc., Case No. 21-51513	\$1,287.50	\$362.96	6.70
1934.025	John M Vizey Finder	Policy Services, Inc., Case No. 21-51513	\$1,360.00	\$375.92	6.80
1934.026	Mark Zabinski Finder	Policy Services, Inc., Case No. 21-51513	\$1,800.00	\$362.72	8.40
1934.027	CMB/Wiley Carter Finder	Policy Services, Inc., Case No. 21-51513	\$1,517.50	\$350.00	4.70
1934.028	Purpose Driven Fin. Servs. Finder	Policy Services, Inc., Case No. 21-51513	\$1,632.50	\$350.00	5.20
1934.029	Premier Group Enterpr. Finder	Policy Services, Inc., Case No. 21-51513	\$2,495.00	\$388.88	10.20
1934.030	Dennis Wirth, Agent Adv. Grp. Finder	Policy Services, Inc., Case No. 21-51513	\$4,397.50	\$350.00	13.70
1934.031	Michael Cales Finder	Policy Services, Inc., Case No. 21-51513	\$2,355.00	\$350.00	7.50
1934.032	George M Villa Finder	Policy Services, Inc., Case No. 21-51513	\$1,357.50	\$350.00	4.20
1934.033	Randy Seymour Finder	Policy Services, Inc., Case No. 21-51513	\$2,887.50	\$362.72	14.90
1934.034	Raul T Gomez Finder	Policy Services, Inc., Case No. 21-51513	\$1,432.50	\$362.72	6.90
1934.035	RD and J, Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$1,380.00	\$350.00	4.20
1934.036	David Rosen Finder	Policy Services, Inc., Case No. 21-51513	\$1,940.00	\$362.96	8.70
1934.037	Bob Patrick Finder (no suit filed)	Policy Services, Inc., Case No. 21-51513	\$442.50	\$0.00	1.20
1934.038	Crissman Crombie Finder	Policy Services, Inc., Case No. 21-51513	\$1,277.50	\$362.72	6.50

1934.039	Agents Insur. Sales & Svv. Finder	Policy Services, Inc., Case No. 21-51513	\$2,247.50	\$418.40	9.90
1934.040	Hart Financial Finder (no suit filed)	Policy Services, Inc., Case No. 21-51513	\$525.00	\$0.00	1.50
1934.041	Savings Options & Solutions Finder (filed in .039 matter)	Policy Services, Inc., Case No. 21-51513	\$497.50	\$0.00	1.40
1934.042	Shantell Wright Finder	Policy Services, Inc., Case No. 21-51513	\$1,780.00	\$375.44	8.20
1934.043	Steven Fortier Finder	Policy Services, Inc., Case No. 21-51513	\$1,807.50	\$362.96	8.30
1934.044	David Obman Finder (filed in .039 matter)	Policy Services, Inc., Case No. 21-51513	\$867.50	\$0.00	2.50
1934.045	Scott Nazarino Finder	Policy Services, Inc., Case No. 21-51513	\$1,967.50	\$367.72	8.80
1934.046	Senior Insurance Service Finder	Policy Services, Inc., Case No. 21-51513	\$2,017.50	\$389.60	8.90
1934.047	Safe Money Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$1,715.00	\$350.00	5.50
1934.048	CWB Investment Advisors Finder (filed in .023 matter)	Policy Services, Inc., Case No. 21-51513	\$870.00	\$0.00	5.30
1934.049	Dianne McClish Finder (no suit filed)	Policy Services, Inc., Case No. 21-51513	\$607.50	\$0.00	1.80
1934.050	Blanchard & Assoc. Finder	Policy Services, Inc., Case No. 21-51513	\$1,752.50	\$375.92	8.10
1934.051	Azar Parchami Finder	Policy Services, Inc., Case No. 21-51513	\$3,882.50	\$350.00	13.30
1934.052	Great Lakes Wealth Mgmt Finder (no suit filed)	Policy Services, Inc., Case No. 21-51513	\$1,505.00	\$0.00	4.90
1934.053	Domonic Cotton Finder	Policy Services, Inc., Case No. 21-51513	\$1,990.00	\$362.72	8.80
1934.054	Flemming Financial Svcs Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$2,917.50	\$388.88	10.80
1934.055	Gregory Talbot Finder	Policy Services, Inc., Case No. 21-51513	\$1,580.00	\$362.96	7.60
1934.056	Jack Nace Finder	Policy Services, Inc., Case No. 21-51513	\$1,532.50	\$362.72	7.10
1934.057	G-Force Technical Matter	Policy Services, Inc., Case No. 21-51513	\$2,037.50	\$0.00	7.00
1934.059	Americian Express Co. Matter	Policy Services, Inc., Case No. 21-51513	\$12,110.00	\$357.19	38.30
	Total:*		\$324,644.00	\$29,860.29	1063.20

*TOTAL FEES ARE NET OF \$7,000.00 BILLING JUDGMENT CREDIT APPLIED TO PC&P MATTER NO. 1934.001, BILLING CATEGORY B160, FEE/EMPLOYMENT APPLICATIONS.

Attached hereto as Exhibit D-1 through D-59 are copies of billing invoices itemizing the fees incurred by PC&P in each of the eleven matters, by date and billing category (portions of a limited number of time entries have been redacted to protect attorney/client privileged information).

A. Summary of Services Rendered in the Bankruptcy Case by Category
PC&P Matter Nos. 1934.001 – 1934.059

Category	Description	Hours	Amount
B110	Case Administration	61.8	\$8,263.00
B120	Asset Analysis and Recovery	182.7	\$58,990.00
B130	Asset Disposition	39.5	\$15,950.00
B160	Fee/Employment Applications	82.2	\$31,955.00
B180	Avoidance Action Analysis	434.4	\$123,822.50
B190	Other Contested Matters (excluding assumption/rejection motions)	262.6	\$92,663.50
	Total:*	1063.20	\$324,644.00
*Total is net of \$7,000 Billing Judgment Credit applied to B160 Fee/Employment Applications			

i. Case Administration (B110)

19. Services rendered in this category involved the management of all case related data, documents and files in the possession of PC&P. This includes the management and organization by PC&P paralegal staff of all data received by PC&P in digital form, discovered on Debtors' servers and data received from third parties, as well as the scanning and digitization of all paper documents and files discovered at Debtors' offices and received from third parties, for the purpose of allowing lawyers from PC&P to conduct efficient review and searches of all data, documents and files related to the Bankruptcy Case.

20. In addition, services rendered in this category include meetings and discussions amongst PC&P attorneys concernering case strategy, work flow, assignment of tasks, and legal research and analysis concerning the anticipated substantive consolidation of the jointly administered bankruptcy cases.

21. PC&P expended a total of 61.80 hours across all matters, which resulted in total charges of \$8,263.00 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibits D-1 through D-59.

ii. Asset Analysis and Recovery (B120)

22. Services rendered in this category include the investigation of assets, review of bank statements, investor files, finder files, e-mail communications, and other documents, and legal research regarding asset recovery. Lawyers at PC&P engaged in a substantial amount of investigation of the Debtors' financial records, which required the drafting of, and the review and analysis of documents produced in response to, Rule 2004 Examination Notices and Subpoenas, and preparing for and conducting Rule 2004 Examinations.

23. Lawyers with PC&P have analyzed the financial information and data on transfers by the Debtor entities to insiders, investors, net winners, finders and other third parties, for purposes of pursuing Title 11, Chapter 5 avoidance claims.

24. PC&P expended a total of 182.70 hours, which resulted in total charges of \$58,990.00 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibits D-1 through D-59.

iii. Asset Disposition (B130)

25. Services rendered in this category involved preparation of asset purchase and sale agreements, the preparation of property sale motions, including the sale of the CCW Note and the sale the Pinball Property, the preparation of Rule 9019 motions, and preparing for, and attending hearings on the motions, and the concomitant legal research.

26. PC&P expended a total of 39.5 hours, which resulted in total charges of \$15,950.00 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibits D-1 through D-59.

iv. Fee/Employment Applications (B160)

27. Services rendered in this category involved drafting the First Interim Application for Allowance of Fees and Expenses for Greg T. Murray as Accountant to Trustee, the Second Fee Application, and this Third Fee Application.

28. PC&P expended a total of 82.20 hours, which resulted in total charges of \$31,955.00 for services rendered in this project category. A billing judgment credit in the amount of \$7,000 has been applied to this project category reducing the total charges for services rendered in this project category to \$24,955.00. The detailed time descriptions for this category are included in Exhibit D-1.

v. Avoidance Action Analysis (B180)

29. Services rendered in this category involved review and analysis of the Debtors' investor records, finders' agreements, bank statements, and financial records, the drafting of 2004 Examination notices and Subpoenas, and legal research pertaining to the Texas Securities Act, fraudulent conveyance actions under 11 USC § 544 and the Texas Uniform Fraudulent Transfers Act, and the net winner rule.

30. Lawyers with PC&P have been reviewing data and analysis prepared by the Trustee's forensic account to identify net winners and finders, and have been preparing adversary case summaries and analysis for review by the Trustee in preparations for the drafting and filing of a substantial number of adversary actions.

31. PC&P expended a total of 434.40 hours, which resulted in total charges of

\$123,822.50 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibits D-1 through D-59.

vi. Other Contested Matters (excluding assumption/rejection motions) (B190)

32. Services rendered in this category involved the review and analysis of the Debtors' records to identify matters that may be contested for the benefit of the estate.

33. Lawyers with PC&P gathered and produced information in response to subpoenas served on the Trustee by the U.S. Department of Justice, and responded to and engaged in email and telephone correspondence, and participated in conference calls and Webex meetings, with Assistant United States Attorneys regarding various matters related to the jointly administered bankruptcy cases.

34. PC&P expended a total of 262.60 hours, which resulted in total charges of \$92,663.50 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibits D-1 through D-59.

B. Summary of Services Rendered in the Main Bankruptcy Case

i. Matters Relating to Landlord, Draper 5's, Administrative Expense Claims
PC&P Matter No. 1934.001 (Estate: Wizard Mode Media, LLC, Case No. 21-51514)

35. Services rendered by lawyers from PC&P relating to the settlement of Draper 5, LLC's ("**Draper**") administrative expense claims (the "**Draper Matter**"), include the review and analysis of the lease of the Utah Premises (described below), the proof of claim filed by Draper in the bankruptcy case, review and analysis of Draper's administrative expense claims, negotiation of a compromise and settlement with Draper, preparation of the Utah Settlement Agreement, and preparation of the Rule 9019 Motion, as further described below.

36. On January 5, 2021, Draper, the landlord of certain premises leased by Debtor,

Wizard Mode Media, LLC (“**Wizard**”), located at 12227 South Business Park Drive, Suite 130, Draper, Utah 84020 (the “**Utah Premises**”), filed a proof of claim (Claim No. 7-1) in the total amount of \$47,183.31, for past due rent through January 1, 2022, late fees, and attorney fees.³ On June 6, 2022, Draper 5 submitted a ledger of lease expenses to the Trustee claiming post-petition administrative expenses in the total amount of \$214,904.91.

37. The Trustee disputed the amounts claimed by Draper and determined in the exercise of his best business judgment that entering into a compromise and settlement of Draper’s claims would avoid protracted and costly litigation and was in the best interest of the Bankruptcy Estates.

38. The Trustee and Draper agreed to settle Draper’s claims on the following terms (the “**Utah Settlement Agreement**”): the Trustee shall: (a) pay to Draper the total amount of \$15,000.00 (the “**Settlement Payment**”) and (b) deliver to Draper a bill of sale or similar document transferring all of Wizard’s rights, interest and title in and to the office furnishings that remain in the Utah Premises, free and clear of all liens, claims and encumbrances (“**Bill of Sale**”).

39. On October 26, 2022, the Trustee filed his *Rule 9019 Motion to Approve Compromise and Settlement with Draper 5, LLC* [ECF No. 182], concerning the settlement of the administrative expense claims of Draper 5, LLC against the Bankruptcy Estate of Wizard Mode Media, LLC.

40. Pursuant to the Utah Settlement Agreement, Draper released the Bankruptcy Estates, the Debtor, deeproot Pinball, LLC, deeproot Tech, LLC, deeproot Studios LLC, the deeproot Affiliates, and the Trustee, from any and all liens (as defined in section 101(37) of the Bankruptcy Code, whether consensual, statutory, possessory, judicial or otherwise), claims (as

³ The Trustee did not assume the lease of the Utah Premises within the 60-day period following the Petition Date and, therefore, pursuant to 11 U.S.C. §365(d)(1), the lease of the Utah Premises has been deemed rejected by the Trustee

defined in section 101(5) of the Bankruptcy Code), or liability, at law or in equity, arising from, or otherwise related to, the lease of the Utah Premises, Draper waived any other claim for post-petition administrative expenses in any of the bankruptcy cases being jointly administered under the Jointly Administered Case, and Draper agreed to file with the Court a Notice of Withdrawal pursuant to Bankruptcy Rule 3006, withdrawing the Proof of Claim filed by Draper in the Jointly Administered Case.

41. On November 2, 2022, the Court entered the parties' *Agreed Order Granting Trustee's Rule 9019 Motion to Approve Compromise and Settlement with Draper 5, LLC* [ECF No. 194], in which the Court approved the Utah Settlement Agreement and authorizing the Trustee to pay Draper 5 \$15,000 as an administrative expense of the Bankruptcy Estate of Wizard Mode Media, LLC.

42. The Utah Settlement Agreement was subject to the Bankruptcy Court's approval of the sale of certain pinball related personal property (the "**Pinball Property**") owned by Debtors Wizard, deeproot Pinball, LLC, deeproot Tech, LLC, and deeproot Studios LLC (other Debtors in the Jointly Administered Case may also have an interest in portions of the Pinball Property). Much of Pinball Property was located at the Utah Premises. On November 22, 2022, the Court entered its *Order Authorizing and Approving the Sale of Certain Personal Property Free and Clear of All Interests Pursuant to 11 U.S.C. §§ 363(b) and (f)* [ECF No. 207], approving the sale of the Pinball Property. The sale of the Pinball Property is described below.

43. PC&P expended a total of 7.90 hours on the Draper Matter in the main bankruptcy case, which resulted in charges of \$3,125.00 for services rendered in this matter. The detailed time descriptions for this matter are included in Exhibit D-1.

ii. Matters Relating to Case Administration

PC&P Matter No. 1934.001 (Estate: Policy Services, Inc., Case No. 21-51513)

44. Services rendered in this category by lawyers from PC&P involved the review and analysis of debtor data, documents and records in the possession of PC&P. The management and organization of all data received by PC&P, including data in digital form discovered on Debtors' servers and received from third parties. Scanning and digitization of all paper documents and files discovered at Debtors' offices and received from third parties was performed by paralegal staff from PC&P for the purpose of providing lawyers from PC&P with an efficient means to search and review all data, records, documents and files related to the Bankruptcy Case.

45. Services rendered in this category also include meetings and discussions amongst PC&P attorneys concerning case strategy, work flow, assignment of tasks, and legal research and analysis concerning the anticipated substantive consolidation of the jointly administered bankruptcy cases.

46. PC&P expended a total of 61.80 hours on case administration in the main bankruptcy case, which resulted in charges of \$8,263.00 for services rendered in this matter. The detailed time descriptions for this matter are included in Exhibit D-1.

iii. Matters Relating to Fee/Employment Applications

PC&P Matter No. 1934.001 (Estate: Policy Services, Inc., Case No. 21-51513)

47. Services rendered by lawyers from PC&P in this category involved drafting the First Interim Application for Allowance of Fees and Expenses for Greg T. Murray as Accountant to Trustee, the Second Fee Application, and this Third Fee Application.

48. PC&P expended a total of 82.2 hours on fee/employment applications in the main bankruptcy case, which resulted in total charges of \$31,955.00 for services rendered in this matter. A billing judgment credit in the amount of \$7,000 has been applied to this project category reducing the total charges for services rendered in this project category to \$24,955.00. The detailed

time descriptions for this matter are included in Exhibit D-1.

C. Matters Relating to the SEC

PC&P Matter No. 1934.002 (Estate: deeproot Funds, LLC, Case No. 21-51521)

49. Services rendered by lawyers from PC&P relating to the SEC and the SEC Case (the “**SEC Matter**”) include review and analysis of offers of judgment proposed by the SEC, review and analysis of proposed settlement agreement, drafting and editing proposed consent judgement and settlement agreement with the SEC.

50. In connection with the SEC Matter, PC&P expended a total of 33.60 hours, which resulted in total charges of \$13,460.00. The detailed time descriptions for this matter are included in Exhibit D-2.

D. Matters Relating to CCW Braun Heights, LLC

PC&P Matter No. 1934.003 (Estate: deeproot Funds, LLC, Case No. 21-51521)

51. This matter concerns a real estate loan from deeproot Funds, LLC, one of the jointly administered debtors, to CCW Braun Heights, LLC (“**CCW**”) for the development of a carwash located in San Antonio, Texas (the “**CCW Matter**”). The loan to CCW was evidenced by a certain promissory note in the original principal sum of \$3,350,000 (the “**Note**”), executed by CCW, payable to the order of deeproot Funds, LLC. As of April 30, 2022, the Note balance of principal plus interest was in an amount equal to approximately \$2,027,964.73, payable to deeproot Funds, LLC, at maturity in a single lump sum payment. The Note was to mature in March 2024. Payment of the Note was secured by a second lien deed of trust on a car wash owned by CCW.

52. The Trustee was approached by CCW with an offer to purchase the Note, free and clear of all liens and encumbrances, for the purchase price of \$1,000,000. In the exercise of his best business judgment, the Trustee entered into a Note Purchase and Sale Agreement with CCW as purchaser, pursuant to which CCW would be a stalking horse bidder and a public sale of the Note would be conducted in accordance with the sale procedures approved by the Court.

53. On September 8, 2022, the Trustee filed his Motion to Approve (A) Sale of Property of the Estate of deeproot Funds, LLC, (B) Sale Procedures in connection with the Sale of Property of the Estate of deeproot Funds, LLC, and (C) Form of Notice for the Sale of Property of the Estate of deeproot Funds, LLC [ECF No. 147], requesting the Court to approve the procedures for the sale of the Note. A motion to expedite the hearing on Trustee's motion was filed by the Trustee on September 8, 2022 [ECF No. 148] (the "**Motion to Expedite**").

54. On September 14, 2022, the Court held a hearing at which the Court approved the sale procedures and the form of notice of the sale of the Note. The Court filed its *Order Approving Trustee's Motion to Approve (A) Sale Procedures, and (B) the Form of Notice for the Sale of Property of the Estate of Deeproot Funds, LLC* on September 14, 2022. [ECF No. 159].

55. On October 13, 2022, the Court filed its *Order Approving Trustee's Motion to Approve the Sale of Property of the Estate of deeproot Funds, LLC, Free and Clear of All Interests Pursuant to 11 U.S.C. §§363(b) and (f)*. [ECF No. 171].

56. Services rendered by lawyers from PC&P in connection with the CCW Matter include negotiation and drafting of a purchase and sale agreement, preparation of the section 363 Sale Motion and Orders, preparation of the Motion to Expedite, and preparation for, and attendance at hearings on such motions. The sale of the Note has closed and the Bankruptcy Estate of deeproot Funds, LLC has received \$1,000,000.00.

57. In connection with the CCW Matter, PC&P expended a total of 10.30 hours, which resulted in total charges of \$4,200.00. The detailed time descriptions for this adversary are included in Exhibit D-3.

E. Matters Relating to MB Hale Ohana Revocable Trust

PC&P Matter No. 1934.004 (Estate: Policy Services, Inc., Case No. 21-51513)

58. This matter (the “**Ohana Matter**”) concerns the MB Hale Ohana Revocable Trust (the “**Trust**”), a trust established for the benefit of Mueller and his father and stepmother, and which used monies fraudulently transferred from Debtors to purchase and own a residential condominium in Kauai, Hawaii.

59. Services rendered by lawyers from PC&P in connection with this matter include communications with counsel to the trust and Mueller’s father and stepmother, negotiations with said counsel for the production of documents, and communications and negotiations with SEC counsel regarding the recovery of the transferred assets for the benefit of the bankruptcy estate, and the settlement with the Trust Parties and the SEC, as further described below.

60. On September 9, 2022, the Trustee filed his *Motion to Approve Compromise and Settlement under Bankruptcy Rule 9019 with the MB Hale Ohana Revocable Trust, Jeffery L. Mueller, and Belinda B. Breen* (the “**Ohana 9010 Motion**”) [ECF No. 149], requesting the Court approve the compromise and settlement agreement between the Trustee and the MB Hale Ohana

Revocable Trust, Jeffery L. Mueller, and Belinda B. Breen, each of whom, along with Mueller, were co-trustees of the Trust (the Trust, Jeffery L. Mueller, and Belinda B. Breen are together hereinafter referred to as the “**Trust Parties**”). The Trust was formed on or about November 5, 2016. On or about November 15, 2016, Policy Services, Inc. transferred \$135,000.00 to the Trust Account. The funds were used toward the purchase of a condominium located at 4330 Kauai Beach Drive, D-10, Lihue, HI 96766. On or about August 10, 2018, Policy Services, Inc. transferred \$135,000.00 to the Trust’s bank account at IBERIA BANK. The funds were used to fund the down payment for the purchase of a condominium located at 2611 Kiahuna Plantation Dr., 7-E, Koloa, HI 96756. The 2611 Kiahuna Plantation Dr. condo was purchased as a retirement home for Jeffrey L. Mueller and Belinda Breen. The condominiums were sold by the Trust and by Jeffery L. Mueller and Belinda B. Breen in or about May and November, 2021, respectively.

61. A compromise and settlement agreement was executed by the Trustee and the Trust Parties on September 6, 2022, pursuant to which the Trust Parties agreed to pay to the Estate the amount of \$300,000.00 (the “**Settlement Amount**”) in exchange for release of the Trustee’s claims against the Trust Parties; Robert Mueller is not a party to the to the settlement agreement.

62. Immediately following execution of the settlement agreement, the Trust Parties paid to Trustee the amount of \$146,075.00. Within 60 days of Bankruptcy Court approval of the settlement agreement, the remaining \$153,925.00 of the Settlement Amount subject to the District Court Freeze Orders (as such are described in the Ohana 9019 Motion) was to be released with the direction that those proceeds were to be paid to the Trustee.

63. On October 4, 2022, the Court filed its *Order Granting Trustee’s Motion to Approve Compromise and Settlement under Bankruptcy Rule 9019 with the MB Hale Ohana Revocable Trust, Jeffery L. Mueller, and Belinda B. Breen* [ECF No. 166].

64. On November 8, 2022, the District Court issued its *Order Modifying Asset Freeze* [SEC Case - ECF No. 70] in which the District Court ordered the District Court Freeze Orders (as such are described in the Ohana 9019 Motion) lifted for the purpose of effectuating the Ohana Settlement Agreement, and further ordered the Trust Parties to effect the transfer of the Settlement Amount to the Trustee. The Bankruptcy Estate of Policy Services, Inc. received \$300,000.00.

65. PC&P expended a total of 7.00 hours, which resulted in total charges of \$3,095.00. The detailed time descriptions for this adversary are included in Exhibit D-4.

F. Matters Relating to Cycladic, LLC

PC&P Matter No. 1934.005 (Estate: Policy Services, Inc., Case No. 21-51513)

66. This matter concerns transactions for the purchase of life insurance policies, or life settlements, by Debtor, Policy Services, Inc., from from Cycladic, LLC (“**Cycladic**”), and affiliates of Cycladic (the “**Cycladic Matter**”). Services rendered by lawyers from PC&P in connection with the Cycladic Matter include the review and analysis of tens of thousands of pages of discovery produced by Cycladic in response to the Rule 2004 Notice of Examination and Subpoena, preparation for, and attendance at, the Rule 2004 Examination of Cycladic and its principal Thomas N. Andrew, negotiation and preparation of the settlement agreement between Cycladic, Thomas N. Andrew, and the Trustee (the “**Cycladic Settlement**”), preparation of the Rule 9019 Motion, preparation for, and attendance at, the hearing on the Rule 9019 Motion, and email and telephone communications with counsel to Cycladic concerning all of the above. At the hearing on the Rule 9019 Motion, the Court approved the Cycladic Settlement, pursuant to which the Bankruptcy Estate of Policy Services, Inc. received \$800,000.00.

67. In connection with the Cycladic Matter, PC&P expended a total of 135.80 hours, which resulted in total charges of \$44,786.00. The detailed descriptions for this matter are included in Exhibit D-5.

G. Matters Relating to Jill R. Winn

PC&P Matter No. 1934.006 (Estate: Policy Services, Inc., Case No. 21-51513)

68. This matter concerns Jill R. Winn, an investor in several deeproot funds. Investigations of the Debtors' records conducted by lawyers from PC&P, have revealed that in return for her investment Ms. Winn received funds back from Debtors in excess of her original investment and she is what the law describes as a "net winner" (the "**Winn Matter**"). The net amount received by Ms. Winn in excess of her original investment with the Debtors is \$258,278.74, which constitutes avoidable transfers under 11 U.S.C. §§ 548 and 544 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act). As such, the Trustee can recover the fraudulently transferred funds from Ms. Winn or any subsequent transferees of the funds under 11 U.S.C. § 550.

69. Lawyers from PC&P have conducted a review and analysis of the Debtors' investor records to uncover evidence of payments made to Ms. Winn, conducted legal research regarding the net winner rule, drafted demand letters, drafted a complaint, and had settlement negotiations with Ms. Winn's counsel.

70. Ms. Winn has agreed to a compromise and settlement of the Trustees claims in the amount of \$154,967.24.

71. In connection with the Winn Matter, PC&P expended a total of 9.10 hours, which resulted in total charges of \$3,372.50. The detailed descriptions for this matter are included in Exhibit D-6.

H. Matters relating to Robert J. Mueller

PC&P Matter No. 1934.007 (Estate: Policy Services, Inc., Case No. 21-51513)

72. This matter relates to Robert J. Mueller, the principal of the Debtors, with respect to adversary claims the Trustee may have against Mr. Mueller (the "**Mueller Matter**"). Services

rendered by lawyers from PC&P in connection with the Mueller Matter include the review and analysis of the Debtors' books and accounting records, financial statements, tax returns, SEC filings, investor records, contracts and agreements, and correspondence, the analysis of potential claims to be brought by the Trustee against Mueller, and legal research required in connection with the preparation of *Plaintiff's Original Complaint* [ECF No. 1 (Adv. 22-05097)] against defendant, Mueller, filed by the Trustee on December 8, 2022, claiming damages in amounts ranging from \$3,000,000 to \$72,000,000 (the "**Mueller Complaint**").

73. In connection with the Mueller Matter, PC&P expended a total of 68.00 hours, which resulted in total charges of \$26,180.00. The detailed descriptions for this matter are included in Exhibit D-7.

I. Matters Relating to Potential Adversary Proceedings - Net Winners
PC&P Matter No. 1934.008 (Estate: Policy Services, Inc., Case No. 21-51513)

74. This matter (the "**Net Winner Matter**") concerns identifying potential adversary proceedings to be brought by the Trustee against those investors who are what the law describes as net winners (i.e. investors who were returned the principal amount of their investment and who also received a return on that investment in the form of interest payments, dividends, etc.). In connection with the Net Winner Matter, lawyers from PC&P have conducted an extensive review and analysis of the Debtors' investor records, financial records, and bank account records, conducted extensive legal research, conferred with the Trustee's forensic accountant, and prepared summaries of potential adversarys for review and approval of the Trustee in anticipation of drafting demand letters and complaints against those investors who are determined to be net winners. The Debtors' records reflect that there were 6 net winners, with a total of \$550,313.47 of transfers that are potentially recoverable to the Estates under 11 U.S.C. §§ 548 and 544 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act).

75. In connection with the Net Winner Matter, PC&P expended a total of 60.00 hours, which resulted in total charges of \$18,912.50. The detailed descriptions for this matter are included in Exhibit D-8.

J. Matters relating to the Sale of the Pinball Property
PC&P Matter No. 1934.10 (Estate: deeproot Tech, LLC, 21-51520)

76. This matter concerns the negotiation and agreement for the sale of the Pinball Property (the “**Pinball Matter**”). The negotiation of the purchase and sale of the Pinball Property spanned a period of many months and were complicated due to the various types of Pinball Property (i.e. hardware, software, patents, trademarks, etc.) to be sold, the multiple locations of the Pinball Property, and the need to coordinate the sale of the Pinball Property with the settlement of landlord, Draper 5, LLC’s, administrative expense claims arising from the lease of the Utah Premises. The Pinball Matter is further described below.

77. The Trustee has been approached by a potential purchaser, Turner Logic, LLC, a Texas limited liability company (the “**Pinball Purchaser**”). The Pinball Purchaser has offered to purchase the Pinball Property for the purchase price of \$50,000 (the “**Pinball Purchase Price**”). In the exercise of his best business judgment, Trustee has determined that entering into the Pinball Property Purchase and Sale Agreement (the “**Pinball Purchase Agreement**”) with the Pinball Purchaser is in the best interest of the Bankruptcy Estates.

78. In order to facilitate the sale, Trustee has agreed to treat the Pinball Purchaser as a stalking horse bidder and to provide certain bid protections in the event another purchaser submits a better offer, which protections include: a break-up fee in the form of a perpetual non-exclusive license to use certain pinball related software developed by the Pinball Purchaser under a contract with one or more of the Debtors, reimbursement of Purchaser’s reasonable and necessary attorney’s fees as approved by the Court and capped at \$5,000.00, and treatment of the fees and

associated costs, in the amount of \$1,930.32, paid post-petition by Purchaser to preserve the Debtors' patents as an administrative expense of the Debtors' Estates.

79. On October 26, 2022, the Trustee filed his *Motion to Approve (A) Sale of Pinball Property, (B) Sale Procedures, Stalking Horse Agreement and Bid Protections in Connection with the Sale of Pinball Property, and (C) the Form of Notice for the Sale of Pinball Property* [ECF No. 181], concerning certain property of the Estates, including, but not limited to, the estates of deeproot Pinball, LLC, deeproot Tech, LLC, deeproot Studios, LLC, and Wizard Mode Media, LLC

80. On November 2, 2022, the Court entered its *Order Granting Trustee's Motion to Approve (A) Sale Procedures, Stalking Horse Agreement and Bid Protections in Connection with the Sale of Pinball Property and (B) the Form of Notice for the Sale of Pinball Property* [ECF No. 195].

81. On November 22, 2022, the Court conducted a hearing (the "**Sale Hearing**") on on the Motion of Trustee, for an Order Authorizing and Approving the Sale of Certain Personal Property Free and Clear of Interests Pursuant to 11 U.S.C. §§ 363 (b) and (f) (the "**Sale Motion**"). No objections to the sale of the pinball property were raised by any party, nor were any competing bids for the purchase of the pinball property submitted to the Trustee. The Court, having reviewed the Sale Motion and having heard the evidence in support of the relief requested therein at the Sale Hearing, determined that the legal and factual bases set forth the the Sale Motion and at the sale hearing established just cause to authorize and approve the sale of the pinball property.

82. On November 22, 2022, the Court entered its *Order Authorizing and Approving the Sale of Certain Personal Preoperty Free and Clear of All Interests Pursuant to 11 U.S.C. §§ 363 (b) and (f)* [ECF No. 207].

83. In connection with the Pinball Matter, lawyers from PC&P negotiated the terms of the purchase and sale of the Pinball Property and concurrently negotiated the terms of the compromise and settlement of Draper's administrative expense claims, as each was contingent upon the other, investigated the location of the Pinball Property, assisted the purchaser's attorney with the preservation of Debtors' patents, investigated, located and retrieved data on Debtors' servers, negotiated and prepared the Pinball Purchase Agreement, prepared the section 363 Motion to Sell, negotiated and prepared the Utah Settlement Agreement, prepared the Rule 9019 Motion, and engaged in numerous phone calls, meetings and discussions throughout the lengthy negotiation period, and attended the hearings on the Trustee's motions related thereto, and attended the Sale Hearing. The Bankruptcy Estate of deeproot Tech, LLC received \$50,000.00 upon the closing of the sale of the pinball property.

84. PC&P expended a total of 46.00 hours in connection with the Pinball Matter, which resulted in total charges of \$17,800.00. The detailed descriptions of this matter are included in Exhibit D-10.

K. Matters Relating to Potential Adversary Proceeding – Finders
PC&P Matter No. 1934.011 (Estate: Policy Services, Inc.)

85. This matter concerns potential adversary proceedings to be brought by the Trustee against those individuals and companies who are referred to in Debtors' records as finders (the "**Finders**"). The Finders are individuals and companies (primarily investment advisers or insurance agents/agencies) who contracted with Debtors to find individual investors willing to invest in one or more of the deeproot investment funds. The Finders received commissions from the Debtors based on the amount of funds invested by the individual investors in the deeproot Funds (the "**Finders Matter**"). These commissions constitute avoidable transfers recoverable by

the Trustee under 11 U.S.C. §§ 548, 544, 550 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act).

86. Lawyers from PC&P have conducted a review and analysis of the Debtors' Finders records, reviewed and analyzed the Finders' contracts, reviewed and analyzed related financial and bank account records of the Debtors, and conducted legal research.

87. In connection with the Finders Matter, PC&P expended a total of 25.30 hours, which resulted in total charges of \$8,462.50. The detailed descriptions of this matter are included in Exhibit D-11.

L. Matters Relating to Adversary Proceedings – Net Winners

PC&P Matter Nos. 1934.013, 014, 018, 019, 020 (Estate: Policy Services, Inc.)

88. These matters concern adversary proceedings brought against those investors whom the Debtors' records reflect are net winners (the "**Net Winner Adversary Matters**"). In connection with the Net Winner Adversary Matters, lawyers from PC&P prepared demand letters and the complaint against the six investors (including Jill R. Winn, discussed in Section III. G., above) who were determined to be net winners (the "**Net Winners**").⁴ The Debtors' records reflect that there were a total of \$550,313.47 of transfers to Net Winners that are potentially recoverable to the Estates under 11 U.S.C. §§ 548, 544, 550 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act).

89. Subsequent to filing the Net Winners Adversary, lawyers from PC&P entered into settlement negotiations on behalf of the the Trustee with each of the Net Winners. Four of the six

⁴ See, adversary proceeding styled: *John Patrick Lowe, Chapter 7 Trustee for the Bankruptcy Estate of deeprout Capital Mgmt., LLC, et al. v. Candice Gillen, Carl Jarnecke as Trustee of the Carl & Paula Jarnecke Revocable Trust, Brownie Martin, Kenneth Martin, David Medlang, Mary Medlang, Alice Snell, and Jill R. Winn*, Adv. Proc. No. 22-05096 (the "**Net Winners Adversary**") [ECF No. 1].

Net Winners have agreed to a compromise and settlement of the Trustee's claims in the total combined settlement amount of \$355,032.12.⁵

90. In connection with the Net Winner Adversary Matters (excluding Jill R. Winn, discussed in Section III. G., above), PC&P expended a total of 34.3 hours, which resulted in charges of \$10,962.50. The detailed descriptions of this matter are included in Exhibits D-13, D-14, D-18, D-19 and D-20.

M. Matters Relating to Adversary Proceedings – Finders

PC&P Matter Nos. 1934.012, 015 - 017, and 021 - 056 (Estate: Policy Services, Inc.)

91. These matters concern adversary proceedings brought by the Trustee against 39 Finders to recover finder's fees and commissions paid by Debtor, Policy Services, totalling approximately \$6,133,804.49 (the "**Finders Adversary Matters**"). The finders' fees and commissions paid to the Finders constitute avoidable transfers recoverable by the Trustee under 11 U.S.C. §§ 548, 544, 550 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act)

92. Lawyers from PC&P prepared demand letters, engaged in discussions with the Finders and their counsel, and prepared the complaints for each of the 37 adversary proceedings filed against the Finders by the Trustee. A chart listing each of the Finders Adversary Matters and the amount of each respective claim is attached as Exhibit E.

93. In connection with the Finders Adversary Matters, PC&P expended a total of 336.60 hours, which resulted in total charges of \$88,930.00. PC&P has also advanced the filing fees for each of these adversary proceedings. The detailed descriptions of these matters are included in Exhibits D-12, D-15 through D-17, and D-21 through D-56.

⁵ The four Net Winners with whom the Trustee has agreed to a settlement, and the amount of each Net Winner's settlement are: i) David and Mary Medlang \$129,500.00, ii) Jill R. Winn \$154,967.24, iii) Alice Snell \$35,282.44, and iv) the Jarnecke Revocable Trust \$35,282.44.

N. Matters Relating to G-Force

PC&P Matter No. 1934.057 (Estate: deeproot Tech, LLC)

94. This matter concerns a default judgment obtained by Debtor, deeproot Tech, LLC against G-Force Technical, Ltd., which was entered September 21, 2021, in the lawsuit styled and numbered *deeproot Tech, LLC v. G-Force Technical, Ltd.*; Cause No. 2019-CI-122367, filed in the 225th Judicial District Court of Bexar County, Texas (the “**G-Force Matter**”).

95. The default judgment entered in favor of deeproot Tech, LLC, is in the amount of \$90,934.30 for damages, \$38,800.00 for attorney’s fees, \$515.36 of court costs, and post-judgment interest on the total sum at the annual rate of 5% from the date of judgment until paid.

96. Lawyers from PC&P prepared post-judgment requests for production and interrogatories, reviewed discovery, and prepared a notice of Rule 2004 examination and subpoena duces tecum.

97. In connection with the G-Force Matter, PC&P expended a total of 7.00 hours, which resulted in total charges of \$2,037.50. The detailed description of this matter is included in Exhibit D-57.

O. Matters Relating to American Express Company

PC&P Matter No. 1934.059 (Estate: Policy Services, Inc.)

98. This matter concerns an adversary proceeding brought by the Trustee against the American Express Company, pursuant to 11 U.S.C. §§ 548, 544, 550 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act), seeking to avoid fraudulent transfers in the total amount of \$1,533,308.77.⁶ (the “**American Express Matter**”).

99. As is detailed in the Mueller Complaint, Mueller used approximately \$2.1 million from the Debtors’ bank accounts to pay many personal expenses (the “**Mueller Transfers**”).

⁶ See, *John Patrick Lowe, Chapter 7 Trustee for the Bankruptcy Estate of deeproot Capital Mgmt. LLC, et al. v. American Express Co.*, Adv. Proc. No. 22-05098, filed December 8, 2022 [ECF No. 1].

From December 10, 2014 to June 7, 2019, approximately \$1,533,308.77 of the Mueller Transfers were charged by Mueller to an American Express Business Gold Rewards Card (the “**AmEx Card**”), issued to Robert J. Mueller, National Wealth Solutions, LLC (an inactive Texas limited liability company, owned by Mueller, which was at no time affiliated in any way with Policy Services or any of the deeproot entities). According to the Debtors’ records, Mueller paid American Express for the personal expenses he charged to the AmEx Card using Debtor, Policy Services’ bank accounts. Such payments constitute a transfer of Debtor, Policy Services’ interest in property for which Policy Services received nothing of value.

100. Lawyers from PC&P prepared and filed the complaint, engaged in discussions with counsel to American Express Company, prepared stipulations, and responded to document requests.

101. In connection with the American Express Matter, PC&P expended a total of 38.30 hours, which resulted in total charges of \$12,110.00. The detailed description of this matter is included in Exhibit D-59.

P. Reimbursement of Expenses

102. PC&P also files this Third Fee Application seeking reimbursement of the reasonable out-of-pocket expenses incurred during the Application Period, in the amount of \$29,860.29. The total expenses incurred by matter are included on the chart found in paragraph 18, above. An itemization report of the expenses incurred by matter is provided in each of Exhibits D-1 through D-59. All expenses for which compensation is requested by PC&P were incurred for and on behalf of the Trustee, and not on behalf of any committee, creditor, or other person.

Q. Allocation of Fees by Matter.

103. Trustees' counsel has allocated the time expenses by the matters discussed above. For the most part, legal fees and expenses associated with a particular estate are allocated to that estate. For example, fees and expenses associated with negotiations with the landlord of Debtors' Utah offices are allocated to the estate of the relevant Debtor tenant, Wizard Mode Media, LLC. Fees and expenses associated with adversary proceeds brought against Finders are allocated to the estate of Policy Services, Inc., as the monies received by Finders were paid from Policy Services' bank accounts. Fees and expenses associated with adversary proceedings brought against Net Winners are allocated to the estate of deeproot Funds, LLC, as the monies received by Net Winners were paid from deeproot Funds, LLC's bank accounts. Fees and expenses related to general case administration matters are allocated to Policy Services, Inc.

104. This is the Third Fee Application for fees and expenses filed by PC&P. This Third Fee Application requests approval of interim fees in the amount of \$324,644.00 and interim expenses in the amount of \$29,860.29, for a total allowed amount of \$354,504.29 in interim hourly fees and expenses.

IV. Authorities and Argument

105. The statutory predicates for the relief sought by this Third Fee Application are §§ 328(a) and 330 of the Bankruptcy Code.

106. Bankruptcy Code § 330(a) provides that in determining the amount of reasonable compensation to be awarded, a Court shall consider the nature, the extent, and the value of the services rendered by the professional, while taking into account the relevant factors, including the following:

- The time spent on such services;
- The rates charged for such services;
- Whether the services were necessary to the administration of, or beneficial at the time which the service was rendered, toward the completion of the chapter 11 case;
- Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issues or task addressed;
- With respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than chapter 11 cases.

11 U.S.C. § 330(a)(3). *See also Busy Beaver Bldg. Ctrs., Inc.*, 19 F.3d 833, 850 (3d Cir. 1994) (noting Bankruptcy Code’s policy of providing adequate compensation and stating that “Congress rather clearly intended to provide sufficient economic incentive to lure competent bankruptcy specialists to practice in the bankruptcy courts.”) (citation and internal quotation marks omitted). *see also In re Woerner*, 783 F.3d 266, 274 (5th Cir. 2015) (“[Section 330] permits a court to compensate an attorney not only for activities that were ‘necessary,’ but also for good gambles—that is, services that were objectively reasonable at the time they were made—even when those gambles do not produce an ‘identifiable, tangible, and material benefit.’”) (citations and internal quotation marks omitted); *see also In re Pilgrim’s Pride Corp.*, 690 F.3d 650 (5th Cir. 2012) (reaffirming that bankruptcy courts have discretion to enhance professional fees in extraordinary cases).

107. The fees incurred by PC&P in representing the Trustee were reasonable and necessary for the administration of the Bankruptcy Case. As reflected in the attached Exhibits D-1 through D-59, PC&P has avoided unnecessary additional legal services and duplication of effort while striving to ensure the highest quality of legal representation.

108. The fees incurred by PC&P were for reasonable and necessary legal work that does not fall within the scope of the Trustee's administrative duties. *See In re: Sharon Sylvester*, 23 F.4th 543, 548 (5th Cir. 2022).

109. PC&P performed these services within a reasonable period of time by professionals that have significant experience in bankruptcy cases. The rates charged by PC&P for this matter are comparable to the rates charged by PC&P in non-bankruptcy matters.

110. The PC&P professionals who have worked on this case during the Application Period are:

Name	Bar Admission Date	Rate	Hours expended on case	Fees requested in the Third Fee Application
Randall A. Pulman	Nov. 1, 1986	\$500.00	152.4	\$76,200.00
Leslie S. Hyman	Jun. 1, 1995	\$450.00	26.2	\$11,790.00
W. Drew Mallender	Oct. 1, 1992	\$375.00	336.2	\$126,075.00
Anna K. MacFarlane	Oct. 25, 2019	\$275.00	346.8	\$95,370.00
PARA-3		\$110.00	64.9	\$7,139.00
Gaurav Mankotia	Sept. 27, 2008 Bar Council of Delhi, India	\$100.00	129.5	\$12,950.00
Byron L. LeFlore	Nov. 3, 1989	\$475.00	0.7	\$332.50
Marshall Swanson	Nov. 6, 2015	\$275.00	6.5	\$1,787.50
		Total:	1063.2	\$331,644.00

PC&P has met the requirements of § 330(a) of the Bankruptcy Code, and the Court should award the fees and expenses sought in the Third Fee Application.

111. The out-of-pocket expenses incurred by PC&P have been billed only for expenses actually incurred by PC&P. Accordingly, charges for expenses such as courier fees, filing fees, outside copy service, parking, travel, postage, meals, charges for public records and transcription services are billed at the actual cost to PC&P. PC&P is generally billed a flat monthly fee for legal research through Westlaw, and such charges are allocated based on actual usage to PC&P's clients.

112. PC&P submits that this Third Fee Application complies with §§ 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the United States Trustee Guidelines.

113. Detailed applications for compensation are required by the Bankruptcy Code, Local Rules, and applicable case law. This Third Fee Application has served the additional purpose of informing the Court and the creditors of the status of the case and the activities of the attorneys involved. The time spent preparing the Third Fee Application is compensable. *See* 11 U.S.C. § 330(a)(6).

114. The Trustee has reviewed this Third Fee Application and has approved the requested amounts and the allocation thereof.

WHEREFORE, PC&P prays that upon consideration hereof, this Court enter an Order (i) approving PC&P's request for interim fees in the amount of \$324,644.00 in fees and \$29,860.29 in related expenses, for a total of \$354,504.29, (ii) authorizing the Trustee to immediately pay PC&P from the appropriate Estate Account the allowed amount of \$354,504.29 for the fees and expenses that have been incurred to date, and (iii) granting such other and further relief as the Court finds appropriate to grant.

[Remainder of Page Left Intentionally Blank]

Respectfully submitted,

PULMAN, CAPPUCCIO & PULLEN, LLP
2161 NW Military Highway, Suite 400
San Antonio, Texas 78213
(210) 222-9494 Telephone
(210) 892-1610 Facsimile

By: /s/ Randall A. Pulman
Randall A. Pulman
Texas State Bar No. 16393250
rpulman@pulmanlaw.com

**ATTORNEYS FOR JOHN PATRICK LOWE,
CHAPTER 7 TRUSTEE FOR THE JOINTLY
ADMINISTERED BANKRUPTCY ESTATE OF
DEEPROOT CAPITAL MANAGEMENT, LLC,
ET AL.**

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of March 2023, I electronically filed the foregoing document using the CM/ECF system, which will serve the document on the following list of parties in interest and parties requesting notice. A copy of the notice/summary of the Third Fee Application will be mailed via US First Class Mail to the parties on the limited service list in this case, and a supplemental certificate of service will be filed to evidence compliance.

Via Counsel CM/ECF:

catherine.curtis@wickphillips.com
jason.rudd@wickphillips.com

Policy Services, Inc.
deeproot Pinball, LLC
deeproot Growth Runs Deep Fund, LLC
deeproot 575 Fund, LLC
deeproot 3 Year Bonus Income Fund, LLC
deeproot BonusGrowth 5 Year Debenture Fund, LLC
deeproot Tech, LLC
deeproot Funds, LLC
deeproot Studios, LLC
deeproot Capital Management, LLC
12621 Silicon Dr.
San Antonio, TX 78249

Via Counsel Via CM/ECF:

catherine.curtis@wickphillips.com;
jason.rudd@wickphillips.com

Wizard Mode Media, LLC
12227 S. Business Park Drive, Suite 130
Draper, UT 84020

Via CM/ECF: pat.lowe.law@gmail.com

John Patrick Lowe
2402 East Main Street
Uvalde, TX 78801

Via CM/ECF:

catherine.curtis@wickphillips.com;
jason.rudd@wickphillips.com

Catherine A. Curtis/Jason M. Rudd
WICK PHILLIPS GOULD & MARTIN, LLP
3131 McKinney Ave, Suite 500
Dallas, TX 75204

Via CM/ECF:

USTPRegion07.SN.ECF@usdoj.gov
Aubrey.thomas@usdoj.gov

United States Trustee - SA12
US TRUSTEE'S OFFICE (Aubrey Thomas)
615 E Houston, Suite 533
San Antonio, TX 78295-1539

Via CM/ECF: don.stecker@lgbs.com

Don Stecker
Linebarger Goggan et al.
112 E. Pecan, Suite 2200
San Antonio, TX 78205

Via CM/ECF: rbattagliaw@outlook.com

Raymond W. Battaglia
LAW OFFICES OF RAY BATTAGLIA, PLLC
66 Granburg Circle
San Antonio, TX 78218

Via CM/ECF: jpetree@mcslaw.com

Jonathan Petree
McGUIRE, CRADDOCK & STROTHER, P.C.
500 N. Akard Street Suite 2200
Dallas, TX 75201

Via CM/ECF: jdunne@smfadlaw.com

John C. Dunne
SHANNON, MARTIN et al.
1001 McKinney Street #1100
Houston, TX 77002

Via CM/ECF: bk-cmurphy@oag.texas.gov

Texas Workforce Commission
c/o Christopher S. Murphy
TEXAS ATTORNEY GENERAL'S OFFICE
PO Box 12548
Austin, TX 78711

Via CM/ECF: pautry@branscomblaw.com

Patrick H. Autry
BRANSCOMB PLLC
4630 N. Loop 1604 West, Suite 206
San Antonio, TX 78249

Via CM/ECF: lmjurek@jureklaw.com

Lynne M. Jurek
THE JUREK LAW GROUP, PLLC
4309 Yoakum Blvd.
Houston, TX 77006

Via CM/ECF: achale@halewoodlaw.com

Craig Hale
HALE | WOOD PLLC
4766 Holladay Blvd.
Holladay, Utah 84117

Via CM/ECF:

stephen.humeniuk@lockelord.com

Stephen J. Humeniuk
LOCKE LORD LLP
600 Congress Avenue, Suite 2200
Austin, TX 78701

Via CM/ECF:

tcunningham@lockelord.com

Thomas J. Cunningham
LOCKE LORD LLP
777 S. Flalger Dr., Suite 215
West Palm Beach, FL

Via CM/ECF:

jkathman@spencerfane.com

msegura@spencerfane.com

Jason Kathman
Misty Segura
Spencer Fane, LLP
5700 Granite Parkway, Suite 650
Plano, Texas 75024

/s/ Randall A. Pulman

Randall A. Pulman

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL., ¹	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

**ORDER GRANTING
THIRD INTERIM APPLICATION FOR ALLOWANCE OF LEGAL FEES AND EXPENSES
FOR PULMAN, CAPPUCCIO & PULLEN, LLP, AS COUNSEL TO THE TRUSTEE
FOR THE TIME PERIOD OF OCTOBER 1, 2022 TO JANUARY 31, 2023**

Came on for consideration the *Third Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of October 1, 2022 to January 31, 2023* (“**Third Interim Application**”). The Court has considered

¹ The jointly administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a “**Bankruptcy Estate**” and collectively, “**Bankruptcy Estates**”.

the Third Interim Application and finds that the fees and expenses represent reasonable compensation for actual and necessary services, and reimbursement for actual, necessary expenses. After considering the pleadings, the Court also finds that (i) it has jurisdiction over the matters raised in the Third Interim Application pursuant to 28 U.S.C. § 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) proper and adequate notice of the Third Interim Application has been given and that no other or further notice is necessary; (iv) all objections to the Third Interim Application have been resolved by this Order or are overruled in their entirety; and (v) upon the record herein after due deliberation thereon good and sufficient cause exists for the granting of the relief as set forth herein.

IT IS THEREFORE ORDERED that the Third Interim Application pursuant to 11 U.S.C. § 330 is hereby **GRANTED**;

IT IS FURTHER ORDERED that the fees in connection with the legal services described in the Third Interim Application are allowed. All interim fees in the amount of \$324,644.00 and all expenses in the amount of \$29,860.29, for the allowance of a total of \$354,504.29 in hourly fees and costs, shall be an administrative expense of the respective Bankruptcy Estates² as outlined in the Third Interim Application.

IT IS FURTHER ORDERED the Trustee is authorized to immediately pay PC&P in connection with the hourly services provided, fees and expenses totaling \$354,504.29 from the specific Bankruptcy Estate accounts, as designated in the chart attached hereto as Exhibit 1.

IT IS FURTHER ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

###

² Capitalized terms shall have the meaning ascribed to them in the Third Interim Application.

Submitted by:

Randall A. Pulman
Texas State Bar No. 16393250
rpulman@pulmanlaw.com
PULMAN, CAPPuccio & PULLEN, LLP
2161 NW Military Highway, Suite 400
San Antonio, Texas 78213
www.pulmanlaw.com
(210) 222-9494 Telephone
(210) 892-1610 Facsimile

**ATTORNEYS FOR JOHN PATRICK LOWE,
CHAPTER 7 TRUSTEE FOR THE JOINTLY ADMINISTERED
BANKRUPTCY ESTATES OF DEEPROOT CAPITAL
MANAGEMENT, LLC, *ET AL.***

EXHIBIT 1

PC&P Matter No.	Matter Description	Debtor Estate	Fees	Expenses	Hours
1934.001	Main Bankruptcy Case	Wizard Mode Media, LLC, Case No. 21-51514 Policy Services, Inc. Case No. 21-51513	\$3,125.00 \$74,210.50	\$0.00 \$967.38	7.90 244.00
1934.002	SEC Matter	deeproot Funds, LLC, Case No. 21-51521	\$13,460.00	\$1,001.84	33.60
1934.003	CCW Matter	deeproot Funds, LLC, Case No. 21-51521	\$4,200.00	\$22.00	10.30
1934.004	Ohana Matter	Policy Services, Inc., Case No. 21-51513	\$3,095.00	\$40.74	7.00
1934.005	Cycladic Matter	Policy Services, Inc., Case No. 21-51513	\$44,786.00	\$7,975.33	135.80
1934.006	Winn Matter	Policy Services, Inc., Case No. 21-51513	\$3,372.50	\$27.00	9.10
1934.007	Mueller Matter	Policy Services, Inc., Case No. 21-51513	\$26,180.00	\$350.00	68.00
1934.008	Net Winners Matter	Policy Services, Inc., Case No. 21-51513	\$18,912.5	\$568.00	60.00
1934.009	Nationwide Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.0
1934.010	Pinball Matter	deeproot Tech, LLC, Case No. 21-51520	\$17,800.00	\$3,451.01	46.00
1934.011	Finders Matter	Policy Services, Inc., Case No. 21-51513	\$8,462.50	\$975.00	25.30
1934.012	Financial Horizons Concepts Finder	Policy Services, Inc., Case No. 21-51513	\$3,132.50	\$350.00	10.00
1934.013	Kenneth & Brownie Martin Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$790.00	\$0.00	2.30
1934.014	David & Mary Medlang Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$7,222.50	\$2,079.68	23.40
1934.015	Financial Partners of America Finder	Policy Services, Inc., Case No. 21-51513	\$2,877.50	\$375.92	11.70
1934.016	INF Solutions LLC Finder	Policy Services, Inc., Case No. 21-51513	\$2,747.50	\$350.00	8.60
1934.017	GM Consultants Group Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$2,062.50	\$383.88	8.90
1934.018	Candice Gillen Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$900.00	\$0.00	2.70

1934.019	Alice Snell Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,160.00	\$0.00	3.40
1934.020	Carl & Paula Jarnecke/Trust Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$890.00	\$0.00	2.50
1934.021	D. Stien/Fidelity Mutual Finder	Policy Services, Inc., Case No. 21-51513	\$2,652.50	\$376.40	11.50
1934.022	McNamara Cap. Investmt Grp Finder	Policy Services, Inc., Case No. 21-51513	\$2,652.50	\$350.00	8.50
1934.023	PGH Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$15,180.00	\$350.00	44.90
1934.024	Jacob Proux Finder	Policy Services, Inc., Case No. 21-51513	\$1,287.50	\$362.96	6.70
1934.025	John M Vizy Finder	Policy Services, Inc., Case No. 21-51513	\$1,360.00	\$375.92	6.80
1934.026	Mark Zabinski Finder	Policy Services, Inc., Case No. 21-51513	\$1,800.00	\$362.72	8.40
1934.027	CMB/Wiley Carter Finder	Policy Services, Inc., Case No. 21-51513	\$1,517.50	\$350.00	4.70
1934.028	Purpose Driven Fin. Servs. Finder	Policy Services, Inc., Case No. 21-51513	\$1,632.50	\$350.00	5.20
1934.029	Premier Group Enterpr. Finder	Policy Services, Inc., Case No. 21-51513	\$2,495.00	\$388.88	10.20
1934.030	Dennis Wirth, Agent Adv. Grp. Finder	Policy Services, Inc., Case No. 21-51513	\$4,397.50	\$350.00	13.70
1934.031	Michael Cales Finder	Policy Services, Inc., Case No. 21-51513	\$2,355.00	\$350.00	7.50
1934.032	George M Villa Finder	Policy Services, Inc., Case No. 21-51513	\$1,357.50	\$350.00	4.20
1934.033	Randy Seymour Finder	Policy Services, Inc., Case No. 21-51513	\$2,887.50	\$362.72	14.90
1934.034	Raul T Gomez Finder	Policy Services, Inc., Case No. 21-51513	\$1,432.50	\$362.72	6.90
1934.035	RD and J, Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$1,380.00	\$350.00	4.20
1934.036	David Rosen Finder	Policy Services, Inc., Case No. 21-51513	\$1,940.00	\$362.96	8.70
1934.037	Bob Patrick Finder (no suit filed)	Policy Services, Inc., Case No. 21-51513	\$442.50	\$0.00	1.20
1934.038	Crissman Crombie Finder	Policy Services, Inc., Case No. 21-51513	\$1,277.50	\$362.72	6.50
1934.039	Agents Insur. Sales & Svcs. Finder	Policy Services, Inc., Case No. 21-51513	\$2,247.50	\$418.40	9.90

1934.040	Hart Financial Finder (no suit filed)	Policy Services, Inc., Case No. 21-51513	\$525.00	\$0.00	1.50
1934.041	Savings Options & Solutions Finder (filed in .039 matter)	Policy Services, Inc., Case No. 21-51513	\$497.50	\$0.00	1.40
1934.042	Shantell Wright Finder	Policy Services, Inc., Case No. 21-51513	\$1,780.00	\$375.44	8.20
1934.043	Steven Fortier Finder	Policy Services, Inc., Case No. 21-51513	\$1,807.50	\$362.96	8.30
1934.044	David Obman Finder (filed in .039 matter)	Policy Services, Inc., Case No. 21-51513	\$867.50	\$0.00	2.50
1934.045	Scott Nazarino Finder	Policy Services, Inc., Case No. 21-51513	\$1,967.50	\$367.72	8.80
1934.046	Senior Insurance Service Finder	Policy Services, Inc., Case No. 21-51513	\$2,017.50	\$389.60	8.90
1934.047	Safe Money Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$1,715.00	\$350.00	5.50
1934.048	CWB Investment Advisors Finder (filed in .023 matter)	Policy Services, Inc., Case No. 21-51513	\$870.00	\$0.00	5.30
1934.049	Dianne McClish Finder (no suit filed)	Policy Services, Inc., Case No. 21-51513	\$607.50	\$0.00	1.80
1934.050	Blanchard & Assoc. Finder	Policy Services, Inc., Case No. 21-51513	\$1,752.50	\$375.92	8.10
1934.051	Azar Parchami Finder	Policy Services, Inc., Case No. 21-51513	\$3,882.50	\$350.00	13.30
1934.052	Great Lakes Wealth Mgmt Finder (no suit filed)	Policy Services, Inc., Case No. 21-51513	\$1,505.00	\$0.00	4.90
1934.053	Domonic Cotton Finder	Policy Services, Inc., Case No. 21-51513	\$1,990.00	\$362.72	8.80
1934.054	Flemming Financial Svcs Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$2,917.50	\$388.88	10.80
1934.055	Gregory Talbot Finder	Policy Services, Inc., Case No. 21-51513	\$1,580.00	\$362.96	7.60
1934.056	Jack Nace Finder	Policy Services, Inc., Case No. 21-51513	\$1,532.50	\$362.72	7.10
1934.057	G-Force Technical Matter	Policy Services, Inc., Case No. 21-51513	\$2,037.50	\$0.00	7.00
1934.059	Amercian Express Co. Matter	Policy Services, Inc., Case No. 21-51513	\$12,110.00	\$357.19	38.30
	Total:*		\$324,644.00	\$29,860.29	1063.20
*TOTAL FEES ARE NET OF \$7,000.00 BILLING JUDGMENT CREDIT APPLIED TO PC&P MATTER NO. 1934.001					

EXHIBIT B

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL., ¹	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

**NOTICE AND SUMMARY OF
THIRD INTERIM APPLICATION FOR ALLOWANCE OF LEGAL FEES AND EXPENSES
FOR PULMAN, CAPPUCCIO & PULLEN, LLP, AS COUNSEL TO THE TRUSTEE
FOR THE TIME PERIOD OF OCTOBER 1, 2022 TO JANUARY 31, 2023**

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS
FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN
MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE
HELD.**

- I. CLIENT: John Patrick Lowe, Chapter 7 Trustee
- II. REQUESTING APPLICATION / FIRM: Randall A. Pulman of Pulman, Cappuccio & Pullen, LLP, (“**PC&P**”) as counsel to the Trustee
- III. TOTAL AMOUNT OF INTERIM FEES AND COSTS REQUESTED: \$354,504.29
 - a. Fees: \$324,644.00
 - b. Expenses and Cost Advances (PC&P): \$29,860.29
 - d. Time period covered: 10/01/2022 – 01/31/2023

¹ The Jointly Administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a “**Bankruptcy Estate**” and collectively, “**Bankruptcy Estates**”.

IV. BREAKOUT OF CURRENT APPLICATION

Name	Bar Admission Date	Rate	Hours expended on case	Fees requested in the Third Fee Application
Randall A. Pulman	Nov. 1, 1986	\$500.00	152.4	\$76,200.00
Leslie S. Hyman	Jun. 1, 1995	\$450.00	26.2	\$11,790.00
W. Drew Mallender	Oct. 1, 1992	\$375.00	336.2	\$126,075.00
Anna K. MacFarlane	Oct. 25, 2019	\$275.00	346.8	\$95,370.00
PARA-3		\$110.00	64.9	\$7,139.00
Gaurav Mankotia	Sept. 27, 2008 Bar Council of Delhi, India	\$100.00	129.5	\$12,950.00
Byron L. LeFlore	Nov. 3, 1989	\$475.00	0.7	\$332.50
Marshall Swanson	Nov. 6, 2015	\$275.00	6.5	\$1,787.50
Billing Judgment Credit				(\$7,000.00)
		Total:	1063.2	\$324,644.00

MINIMUM FEE INCREMENTS: 0.1 HOURS

EXPENSES: \$29,860.29 (Filing Fees, Photocopying and Postage associated with providing notices to creditors)

AMOUNT ALLOCATED FOR PREPARATION OF THIS FEE APPLICATION: \$10,000.00

V. PRIOR APPLICATIONS: First Interim Fee Application and Second Interim Fee Application.

VI. OTHER CO-EQUAL OR ADMINISTRATIVE CLAIMANTS IN THIS CASE:

a. John Patrick Lowe, Chapter 7 Trustee (“Trustee”).

VII. RESULTS OBTAINED:

As reflected in the Third Interim Fee Application, PC&P has provided legal services and has obtained favorable results for the Bankruptcy Estates in connection with the services provided to the Bankruptcy Estates. Among other things, PC&P has: (1) negotiated favorable settlements of the administrative expense claims brought by of Debtors’ landlord to the benefit of the Estate of Wizard Mode Media, LLC, in connection therewith; reviewed and analyzed financial and corporate records, communicated with counsel, communicated with Trustee, prepared the settlement agreement, motion to approve compromise and settlement, and attended hearings; extensive review of Debtors’ electronic data and digitized all paper records to allow for efficient and effective review and analysis of Debtors’ records; review and analysis of the Debtors’ records to identify matters that may be contested for the benefit of the Debtors’ estates; communications with the Trustee regarding such claims; preparation of fee applications; (2) communicated with SEC counsel, video conferences with SEC counsel; discussions with SEC counsel and with Trustee regarding waiver of privilege request; (3) through the sale of a promissory note payable to deeproot Funds, LLC by CCW, netted the Estate of deeproot Funds,

LLC \$1,000,000.00, in proceeds, in connection therewith, reviewed and analyzed loan documents, corporate records and financial documents, communicated with counsel, negotiated and prepared purchase and sale agreement, prepared motion to sell, and attended hearings; (4) negotiated the settlement of fraudulent transfer claims to be brought against the MB Hale Ohana Revocable Trust and two of its co-trustees, prepared the Rule 9019 Motion to approve compromise and settlement, in connection therewith, communicated with counsel to the trust, the co-trustees, and the SEC, reviewed and analyzed trust records, financial records, conducted legal research, attended hearings, the settlement of the MB Hale Ohana Revocable Trust matter netted the Estate of Policy Services, Inc. \$300,000.00 in proceeds; (5) reviewed and analyzed the Debtors' life settlement records, policy purchase agreements, financial records, voluminous SEC document production and transcripts, the drafting of 2004 Examination Notice and Subpoena, appearance at hearing to address objections, negotiated the settlement of fraudulent transfer claims to be brought against Cycladic, LLC, prepared the settlement agreement, prepared the Rule 9019 Motion to approve compromise and settlement, in connection therewith, communicated with counsel to Cycladic, attended hearings, the settlement of the Cycladic matter netted the Estate of Policy Services, Inc. \$800,000.00; (6) reviewed and analyzed Debtors' records, performed extensive legal research, communicated with Trustee, drafted and filed an adversary proceeding against Robert J. Mueller to recover fraudulent transfers and damages in amounts ranging from \$3,000,000 to \$72,000,000; (7) reviewed and analyzed the Debtors' investor records, bank statements, and financial records, the drafting of 2004 Examination notices and Subpoenas, and substantial legal research., to identify investors who are net winners, prepared and sent demand letters, prepared and filed a complaint, negotiated settlements with net winners, when approved by the Court the combined settlements with the net winners are anticipated to net the Estate of deeproot Funds, LLC. Approximately \$355,032.12; (9) negotiated the sale of the Debtors' tangible and intangible pinball property, prepared the pinball property purchase and sale agreement, in connection therewith, communicated with counsel and seller, prepared purchase and sale agreement, coordinated sale with settlement of landlord's administrative expense claims, prepared motion to sell, sale procedures and proposed orders, the sale of the pinball property netted the Estate of deeproot Tech, LLC \$50,000.00; (10) reviewed and analyzed the Debtors' investor records, finders' agreements, bank statements, and financial records, the drafting of 2004 Examination notices and Subpoenas, prepared and sent demand letters, and filed complaints against approximately 37 finders to recover finder's fees for the Estate of Policy Services, Inc. totaling approximately \$6,133,804.4; (11) prepared post judgement requests for discovery, reviewed discovery, prepared Rule 2004 examination and subpoena duces tecum, to recover on a default judgment against G-Force Technical, Ltd. in favor of deeproot Tech, LLC, totaling approximately \$129,000.00 (12) reviewed and analyzed the Debtor's financial records and bank statements, prepared subpoenas, prepared and filed a complaint against American Express Company for fraudulent transfers from the Estate of Policy Services, Inc. for charges to Mueller's personal credit card in the approximate amount of \$1,533,308.77.

PC&P Matter No.	Matter Description	Debtor Estate	Fees	Expenses	Hours
-----------------------	--------------------	---------------	------	----------	-------

{00596876;2}

		Wizard Mode Media, LLC, Case No. 21-51514	\$3,125.00	\$0.00	7.90
1934.001	Main Bankruptcy Case	Policy Services, Inc. Case No. 21-51513	\$74,210.50	\$967.38	244.00
1934.002	SEC Matter	deeproot Funds, LLC, Case No. 21-51521	\$13,460.00	\$1,001.84	33.60
1934.003	CCW Matter	deeproot Funds, LLC, Case No. 21-51521	\$4,200.00	\$22.00	10.30
1934.004	Ohana Matter	Policy Services, Inc., Case No. 21-51513	\$3,095.00	\$40.74	7.00
1934.005	Cycladic Matter	Policy Services, Inc., Case No. 21-51513	\$44,786.00	\$7,975.33	135.80
1934.006	Winn Matter	Policy Services, Inc., Case No. 21-51513	\$3,372.50	\$27.00	9.10
1934.007	Mueller Matter	Policy Services, Inc., Case No. 21-51513	\$26,180.00	\$350.00	68.00
1934.008	Net Winners Matter	Policy Services, Inc., Case No. 21-51513	\$18,912.50	\$568.00	60.00
1934.009	Nationwide Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.0
1934.010	Pinball Matter	deeproot Tech, LLC, Case No. 21-51520	\$17,800.00	\$3,451.01	46.00
1934.011	Finders Matter	Policy Services, Inc., Case No. 21-51513	\$8,462.50	\$975.00	25.30
1934.012	Financial Horizons Concepts Finder	Policy Services, Inc., Case No. 21-51513	\$3,132.50	\$350.00	10.00
1934.013	Kenneth & Brownie Martin Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$790.00	\$0.00	2.30
1934.014	David & Mary Medlang Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$7,222.50	\$2,079.68	23.40
1934.015	Financial Partners of America Finder	Policy Services, Inc., Case No. 21-51513	\$2,877.50	\$375.92	11.70
1934.016	INF Solutions LLC Finder	Policy Services, Inc., Case No. 21-51513	\$2,747.50	\$350.00	8.60
1934.017	GM Consultants Group Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$2,062.50	\$383.88	8.90
1934.018	Candice Gillen Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$900.00	\$0.00	2.70
1934.019	Alice Snell Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,160.00	\$0.00	3.40
1934.020	Carl & Paula Jarnecke/Trust Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$890.00	\$0.00	2.50
1934.021	D. Stien/Fidelity Mutual Finder	Policy Services, Inc., Case No. 21-51513	\$2,652.50	\$376.40	11.50

{00596876;2}

1934.022	McNamara Cap. Investmt Grp Finder	Policy Services, Inc., Case No. 21-51513	\$2,652.50	\$350.00	8.50
1934.023	PGH Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$15,180.00	\$350.00	44.90
1934.024	Jacob Proux Finder	Policy Services, Inc., Case No. 21-51513	\$1,287.50	\$362.96	6.70
1934.025	John M Vizy Finder	Policy Services, Inc., Case No. 21-51513	\$1,360.00	\$375.92	6.80
1934.026	Mark Zabinski Finder	Policy Services, Inc., Case No. 21-51513	\$1,800.00	\$362.72	8.40
1934.027	CMB/Wiley Carter Finder	Policy Services, Inc., Case No. 21-51513	\$1,517.50	\$350.00	4.70
1934.028	Purpose Driven Fin. Servs. Finder	Policy Services, Inc., Case No. 21-51513	\$1,632.50	\$350.00	5.20
1934.029	Premier Group Enterpr. Finder	Policy Services, Inc., Case No. 21-51513	\$2,495.00	\$388.88	10.20
1934.030	Dennis Wirth, Agent Adv. Grp. Finder	Policy Services, Inc., Case No. 21-51513	\$4,397.50	\$350.00	13.70
1934.031	Michael Cales Finder	Policy Services, Inc., Case No. 21-51513	\$2,355.00	\$350.00	7.50
1934.032	George M Villa Finder	Policy Services, Inc., Case No. 21-51513	\$1,357.50	\$350.00	4.20
1934.033	Randy Seymour Finder	Policy Services, Inc., Case No. 21-51513	\$2,887.50	\$362.72	14.90
1934.034	Raul T Gomez Finder	Policy Services, Inc., Case No. 21-51513	\$1,432.50	\$362.72	6.90
1934.035	RD and J, Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$1,380.00	\$350.00	4.20
1934.036	David Rosen Finder	Policy Services, Inc., Case No. 21-51513	\$1,940.00	\$362.96	8.70
1934.037	Bob Patrick Finder (no suit filed)	Policy Services, Inc., Case No. 21-51513	\$442.50	\$0.00	1.20
1934.038	Crissman Crombie Finder	Policy Services, Inc., Case No. 21-51513	\$1,277.50	\$362.72	6.50
1934.039	Agents Insur. Sales & Svcs. Finder	Policy Services, Inc., Case No. 21-51513	\$2,247.50	\$418.40	9.90
1934.040	Hart Financial Finder (no suit filed)	Policy Services, Inc., Case No. 21-51513	\$525.00	\$0.00	1.50
1934.041	Savings Options & Solutions Finder (filed in .039 matter)	Policy Services, Inc., Case No. 21-51513	\$497.50	\$0.00	1.40

1934.042	Shantell Wright Finder	Policy Services, Inc., Case No. 21-51513	\$1,780.00	\$375.44	8.20
1934.043	Steven Fortier Finder	Policy Services, Inc., Case No. 21-51513	\$1,807.50	\$362.96	8.30
1934.044	David Obman Finder (filed in .039 matter)	Policy Services, Inc., Case No. 21-51513	\$867.50	\$0.00	2.50
1934.045	Scott Nazarino Finder	Policy Services, Inc., Case No. 21-51513	\$1,967.50	\$367.72	8.80
1934.046	Senior Insurance Service Finder	Policy Services, Inc., Case No. 21-51513	\$2,017.50	\$389.60	8.90
1934.047	Safe Money Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$1,715.00	\$350.00	5.50
1934.048	CWB Investment Advisors Finder (filed in .023 matter)	Policy Services, Inc., Case No. 21-51513	\$870.00	\$0.00	5.30
1934.049	Dianne McClish Finder (no suit filed)	Policy Services, Inc., Case No. 21-51513	\$607.50	\$0.00	1.80
1934.050	Blanchard & Assoc. Finder	Policy Services, Inc., Case No. 21-51513	\$1,752.50	\$375.92	8.10
1934.051	Azar Parchami Finder	Policy Services, Inc., Case No. 21-51513	\$3,882.50	\$350.00	13.30
1934.052	Great Lakes Wealth Mgmt Finder (no suit filed)	Policy Services, Inc., Case No. 21-51513	\$1,505.00	\$0.00	4.90
1934.053	Domonic Cotton Finder	Policy Services, Inc., Case No. 21-51513	\$1,990.00	\$362.72	8.80
1934.054	Flemming Financial Serv. Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$2,917.50	\$388.88	10.80
1934.055	Gregory Talbot Finder	Policy Services, Inc., Case No. 21-51513	\$1,580.00	\$362.96	7.60
1934.056	Jack Nace Finder	Policy Services, Inc., Case No. 21-51513	\$1,532.50	\$362.72	7.10
1934.057	G-Force Technical Matter	Policy Services, Inc., Case No. 21-51513	\$2,037.50	\$0.00	7.00
1934.059	Amercian Express Co. Matter	Policy Services, Inc., Case No. 21-51513	\$12,110.00	\$357.19	38.30
	Total:*		\$324,644.00	\$29,860.29	1063.20
*TOTAL FEES ARE NET OF \$7,000.00 BILLING JUDGMENT CREDIT APPLIED TO PC&P MATTER NO. 1934.001					

Respectfully submitted,

PULMAN, CAPPUCCIO & PULLEN, LLP
2161 NW Military Highway, Suite 400
San Antonio, Texas 78213
www.pulmanlaw.com
(210) 222-9494 Telephone
(210) 892-1610 Facsimile

By: /s/Randall A. Pulman
Randall A. Pulman
Texas State Bar No. 16393250
rpulman@pulmanlaw.com

**ATTORNEYS FOR JOHN PATRICK LOWE,
CHAPTER 7 TRUSTEE**

EXHIBIT C



IT IS HEREBY ADJUDGED and DECREED that the below described is SO ORDERED.

Dated: January 20, 2022.

A handwritten signature in black ink, appearing to read "Mike Parker".

**MICHAEL M. PARKER
UNITED STATES BANKRUPTCY JUDGE**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL.,	§	BANKRUPTCY No. 21-51523-MMP
	§	
DEBTORS.	§	JOINTLY ADMINISTERED

ORDER ON THE APPLICATION OF TRUSTEE FOR AUTHORITY TO EMPLOY COUNSEL

Came on for consideration the *Application of Trustee for Authority to Employ Counsel* (the “**Application**”)¹ filed by John Patrick Lowe, the Chapter 7 Trustee (the “**Trustee**”) for the captioned jointly administered chapter 7 case. Based on the representations made in the Application and in the supporting *Affidavit of Randall A. Pulman in Support of the Application of Trustee for Authority to Employ Counsel*, the Court finds that (i) it has jurisdiction over the matters raised in the Application pursuant to 28 U.S.C. §§ 157 and 1334; (ii) this is a core proceeding

¹ Capitalized terms unless otherwise defined herein shall have the meaning as ascribed to them in the Application.

pursuant to 28 U.S.C. § 157(b)(2); (iii) the relief requested in the Application approving the employment of Pulman, Cappuccio & Pullen, LLP (“**PC&P**”) is in the best interest of the Estate and its creditors; (iv) PC&P holds no interest adverse to the Estate and is a disinterested person under 11 U.S.C. § 101(14); (v) proper and adequate notice of the Application has been given and no further notice is necessary; (vi) no objections to the Application have been filed; and (vii) based upon the record herein, after due deliberation, good and sufficient cause exists for the granting of the Application in all respects.

IT IS, THEREFORE, ORDERED that pursuant to section 327(a) of the Bankruptcy Code, the Trustee is authorized to employ PC&P with Randall A. Pulman to act as lead counsel to represent him as Trustee in this Case effective as of December 20, 2021, in accordance with the terms described in the Application, the engagement letter, and this Order, and to perform the services described below:

- a) to file pleadings with the court and to represent the Estate's interest in regard to any adversaries, appeals, or contested matters before this court and litigation in other courts, particularly with regard to the Estate's interest in various assets and the positions of secured and unsecured creditors, whether by motion, adversary action, turnover proceedings, or litigation activities of every description in other courts;
- b) to investigate, analyze, institute and prosecute actions regarding determination and recovery of property of the Estate, including investigation and prosecution of determination and lien perfection, avoidance litigation as well as collection and liquidation of assets of the Estate, to the extent such activities would be economically beneficial to the Estate;
- c) to assist the Trustee where necessary to negotiate and consummate non-routine sales or leases of the assets of the Estate, wherever they may be found, including sales free and clear of liens, claims and encumbrances, and to institute any necessary proceedings in regard thereto;
- d) to institute and prosecute non-routine objections to exemptions and non-routine objections to proofs of claim;
- e) to co-ordinate activities with the United States Trustee as appropriate in connection with issues of the integrity of the bankruptcy courts and procedures;

- f) to aid in the representation of the Trustee in any litigation against Trustee in Trustee's official capacity;
- g) to assist in resolution of sales of, and any title problems associated with, the Estate's property; and
- h) to collect any judgments that may be entered in favor of the Estate; and
- i) to assist in any other work requested by the Trustee.

IT IS FURTHER ORDERED that the Law Firm shall not be compensated by the bankruptcy Estate for performing duties required to be performed by the Trustee.

IT IS FURTHER ORDERED that if any supplemental declarations or affidavits are filed and served after entry of this Order, absent any objections within 21 days after the filing and service of such supplemental declarations or affidavits, PC&P's employment shall continue as authorized pursuant to this Order.

IT IS FURTHER ORDERED that PC&P shall be compensated upon appropriate application in accordance with Bankruptcy Code sections 330 and 331, the Federal Rules of Bankruptcy Procedure, and the Local Rules of Bankruptcy of the Western District of Texas.

IT IS FURTHER ORDERED that the Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

###

SUBMITTED BY:

Randall A. Pulman
Texas State Bar No. 16393250
rpulman@pulmanlaw.com

Anna K. MacFarlane
Texas State Bar No. 24116701
amacfarlane@pulmanlaw.com

PULMAN, CAPPUCCIO & PULLEN, LLP
2161 NW Military Highway, Suite 400
San Antonio, Texas 78213
www.pulmanlaw.com

(210) 222-9494 Telephone

(210) 892-1610 Facsimile

**PROPOSED ATTORNEYS FOR JOHN PATRICK LOWE,
CHAPTER 7 TRUSTEE FOR THE JOINTLY ADMINISTERED CASE
OF IN RE DEEPROOT CAPITAL MANAGEMENT, LLC ET AL.**

EXHIBIT D-1

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232146
 Account No. 1934.001

Page: 1

Deeproot - Policy Services, Inc. Case No. 21-51513, et al

Fees

					Rate	Hours	
10/03/2022	PR3	B110	A110	Manage data/files - Saving files from Synology Machine; Researching and compiling research on deeproot entities and their Life Settlement Licenses.	110.00	3.70	407.00
	RAP	B190	A104	Review of 9019 Motion with Draper 5 to resolve landlord claims.	500.00	0.20	100.00
	WDM	B190	A103	Draft/revise proposed settlement agreement with Draper 5, LLC per Randall A. Pulman's comments. Email same to Craig Hale, counsel to Draper 5, LLC.	375.00	0.30	112.50
10/04/2022	PR3	B110	A110	Manage data/files - Working on the Synology Machine; Searching for Thomas Andrew's Life Insurance License	110.00	2.10	231.00
	WDM	B160	A104	Review/analyze attorney time entries in connection with preparation of second interim fee application.	375.00	1.80	675.00
	WDM	B160	A103	Draft/revise second interim fee application.	375.00	3.00	1,125.00
10/05/2022	WDM	B160	A104	Review/analyze time logs for accuracy and reasonableness.	375.00	2.10	787.50
	WDM	B160	A103	Draft/revise fee application.	375.00	2.30	862.50
10/06/2022	PR3	B110	A110	Manage data/files - Reviewing Synology documents	110.00	1.60	176.00
	WDM	B160	A103	Draft/revise Second Interim Fee Application.	375.00	5.00	1,875.00

Lowe, Pat

01/31/2023

Account No: 1934-001M

Statement No. 232146

Deeproot - Policy Services, Inc. Case No. 21-51513, et al

	GM	B120	A103	Prepare motion for [REDACTED] [REDACTED]	100.00	3.00	300.00
10/07/2022	PR3	B110	A110	Manage data/files - Saving and moving deeproot documents to be reviewed.	110.00	1.60	176.00
	WDM	B160	A105	In office conference with Randall A. Pulman regarding contents of fee application.	375.00	0.20	75.00
	RAP	B160	A105	In office conference with W. Drew Mallender regarding fee application.	500.00	0.20	100.00
10/10/2022	GM	B120	A103	Continue research prepare Motion for [REDACTED]	100.00	2.00	200.00
10/11/2022	PR3	B110	A110	Manage data/files - Saving Synology docs	110.00	3.60	396.00
	WDM	B160	A103	Draft/revise second interim fee application.	375.00	0.50	187.50
10/12/2022	AKM	B160	A101	In-office conference with Randall A. Pulman and W. Drew Mallender regarding strategy for fee application.	275.00	0.60	165.00
	PR3	B110	A110	Manage data/files - monitoring and saving virtual computer documents	110.00	2.00	220.00
	WDM	B160	A105	Communicate (in firm). Meet with Randall A. Pulman and Anna MacFarlane regarding fee application. Conference call with P Lowe regarding same.	375.00	0.60	225.00
	WDM	B160	A103	Draft/revise second interim fee application.	375.00	1.50	562.50
	WDM	B190	A103	Draft/revise settlement agreement, 9019 motion and order regarding settlement of Draper 5 administrative expense claims. Email to Craig Hale regarding same.	375.00	2.50	937.50
	RAP	B160	A105	In office conference with Anna MacFarlane and W. Drew Mallender regarding fee application.	500.00	0.60	300.00
10/13/2022	PR3	B110	A110	Manage data/files - monitoring and saving virtual computer documents	110.00	2.00	220.00
	AKM	B160	A101	Confer in-office with Randall A. Pulman and W. Drew Mallender regarding fee application.	275.00	0.20	55.00
	WDM	B160	A105	Communicate (in firm). Meet with			

Lowe, Pat

01/31/2023

Account No: 1934-001M

Statement No. 232146

Deeprout - Policy Services, Inc. Case No. 21-51513, et al

					Rate	Hours	
				Randall A. Pulman and Anna MacFarlane regarding second interim fee application.	375.00	0.20	75.00
	WDM B190	A107		Communicate (other outside counsel) Craig Hale regarding revisions to settlement documents.	375.00	0.10	37.50
	RAP B160	A105		Meet with Anna MacFarlane and W. Drew Mallender regarding second interim fee application.	500.00	0.20	100.00
10/14/2022	PR3 B110	A110		Manage data/files - Saving documents from the Synology machine; Searching for references to Georgia Settlement Group	110.00	4.10	451.00
	RAP B160	A111		Review of draft invoices on 11 matters; telephone conference with UST regarding privilege issues; instructions to D. Mallender regarding same.	500.00	2.50	1,250.00
	WDM B160	A103		Draft/revise second interim fee application.	375.00	4.00	1,500.00
	WDM B190	A107		Conference call with Randall A. Pulman and Aubrey Thomas to obtain guidance concerning redactions for atty/client privileged time entries.	375.00	0.40	150.00
	RAP B190	A107		Conference call with Aubrey Thomas with W. Drew Mallender regarding redactions to time entries in fee application.	500.00	0.40	200.00
10/16/2022	WDM B160	A103		Draft/revise second interim fee application.	375.00	3.80	1,425.00
10/17/2022	PR3 B110	A110		Manage data/files - Saving and reviewing Jackson Life production documents; Saving documents to external hard drives from the Synology computer	110.00	5.00	550.00
	AKM B160	A101		Review and analyze fee application memo; conduct legal research regarding same; confer with Randall A. Pulman and Gaurav Mankotia regarding memo.	275.00	1.10	302.50
	RAP B160	A104		Review and edit of fee application; office conference with D. Mallender regarding same.	500.00	2.00	1,000.00
	WDM B160	A105		Meeting with Randall A. Pulman, discuss			

Lowe, Pat

01/31/2023

Account No: 1934-001M

Statement No. 232146

Deeprout - Policy Services, Inc. Case No. 21-51513, et al

				Rate	Hours	
			matters concerning second interim fee application.	375.00	0.20	75.00
	WDM B160	A103	Draft/revise second interim fee application.	375.00	3.70	1,387.50
	WDM B190	A107	Email correspondence with Craig Hale regarding revisions to settlement documents.	375.00	0.10	37.50
	WDM B190	A103	Draft/revise Draper 5 settlement documents. Email to P Lowe regarding same.	375.00	0.20	75.00
	WDM B160	A103	Draft/revise second interim fee application.	375.00	7.40	2,775.00
	WDM B160	A105	Meet with Randall A. Pulman to discuss, review and revise fee application.	375.00	0.50	187.50
	WDM B160	A103	Draft Notice and Summary for second interim fee application.	375.00	0.50	187.50
	GM B120	A103	Prepare Memo-Redaction of information in Fee Apps	100.00	2.00	200.00
	GM B120	A103	Research for case laws for memo-Redaction of information in Fee Apps	100.00	2.00	200.00
	RAP B160	A105	In office meeting with W. Drew Mallender to discuss, review and revise 2nd interim fee application.	500.00	0.50	250.00
10/18/2022	AKM B120	A101	Confer with Gaurav Mankotia regarding fee memo.	275.00	0.20	55.00
	AKM B120	A101	Review of Greg Murray draft report.	275.00	0.30	82.50
	AKM B160	A101	Confer with W. Drew Mallender regarding fee app.	275.00	0.20	55.00
	RAP B160	A104	Review and edit of fee application; review and edit of fee statement; telephone conference with P. Lowe regarding same; forward invoices to Lowe for Approval; office conference with D. Mallender regarding same.	500.00	2.00	1,000.00
	RAP B190	A104	Review and edit of Settlement Agreement with Draper 5.	500.00	0.30	150.00
	WDM B160	A103	Draft/revise second interim fee application.	375.00	5.00	1,875.00
	WDM B190	A105	Meet with Randall A. Pulman regarding comments to Draper settlement agreement.	375.00	0.20	75.00
	WDM B160	A103	Draft/revise second interim fee			

Lowe, Pat

01/31/2023

Account No: 1934-001M

Statement No. 232146

Deeproot - Policy Services, Inc. Case No. 21-51513, et al

				Rate	Hours	
			application.	375.00	2.00	750.00
	GM	B120	A103 Confer with Anna MacFarlane regarding memo- Redaction of information in Fee Apps	100.00	0.20	20.00
10/19/2022	WDM	B160	A103 Draft/revise second interim fee application.	375.00	6.00	2,250.00
	WDM	B190	A103 Draft/revise Draper 5 settlement agreement.	375.00	0.20	75.00
	GM	B120	A103 continue Prepare Memo-Redaction of information in Fee Apps	100.00	2.00	200.00
10/20/2022	AKM	B160	A101 Email to team with total amount of claims against Finders.	275.00	0.10	27.50
	WDM	B160	A104 Review/analyze second interim fee application.	375.00	0.50	187.50
	WDM	B190	A107 Communicate (other outside counsel) Craig Hale regarding execution of settlement agreement.	375.00	0.20	75.00
	GM	B120	A103 Confer with Randall A. Pulman on Memo- Redaction of Fee App	100.00	0.10	10.00
	GM	B120	A103 Finalize Memo- Redaction of Fee App	100.00	1.00	100.00
10/24/2022	PR3	B110	A110 Manage data/files - Syncing and saving documents from the deeproot virtual machines	110.00	1.00	110.00
10/25/2022	PR3	B110	A110 Manage data/files - Working through the deeproot virtual machines	110.00	1.50	165.00
	WDM	B160	A103 Draft/revise second interim fee application. Meet with Randall A. Pulman regarding same.	375.00	3.20	1,200.00
	WDM	B190	A103 Draft/revise Draper 9019 Motion. Prepare exhibits and motion for filing.	375.00	1.50	562.50
	RAP	B110	A104 Management of payments to Pat Lowe for refund of fees and payments of purchase proceed; review and sign checks.	500.00	0.30	150.00
10/26/2022	WDM	B160	A103 Review and redact invoices, revise matter chart. Revise notice and summary.	375.00	3.70	1,387.50
10/27/2022	WDM	B160	A103 Draft/revise first interim fee application for Greg Murray.	375.00	0.70	262.50

Lowe, Pat

01/31/2023

Account No: 1934-001M

Statement No. 232146

Deeproot - Policy Services, Inc. Case No. 21-51513, et al

				Rate	Hours	
	WDM B160	A103	Draft/revise order for second interim fee application, edit summary, edit fee application, revise fee application matter chart.	375.00	3.40	1,275.00
	WDM B190	A107	Email to Craig Hale regarding filing and hearing date.	375.00	0.10	37.50
	RAP B160	A104	Review of final draft of 2nd Fee Application; review of redactions on invoices.	500.00	0.50	250.00
	RAP B160	A104	Review of Murray's invoices; forward to D. Mallender for Fee Application.	500.00	0.20	100.00
10/28/2022	AKM B120	A101	Review of subpoenas.	275.00	0.30	82.50
	WDM B160	A103	Draft/revise matter, fee and hour breakdown chart for fee application and summary.	375.00	1.40	525.00
	WDM B160	A103	Draft/revise first interim fee application for Greg Murray	375.00	0.50	187.50
10/31/2022	WDM B160	A103	Draft/revise First Interim Fee Application, Proposed Order and Notice of Application for Fees and Expenses of Greg Murray.	375.00	2.70	1,012.50
	WDM B160	A104	Review Second Interim Fee App for final changes/revisions prior to filing.	375.00	0.70	262.50
	RAP B160	A104	Final review and signature of 2nd Fee Application.	500.00	0.30	150.00
11/01/2022	AKM B190	A105	Office conference with Randall A. Pulman, Leslie S. Hyman, and W. Drew Mallender regarding adversary proceeding strategy.	275.00	2.40	660.00
	WDM B190	A109	Prepare for and attend hearing on Motion to Approve Settlement with Draper 5.	375.00	1.20	450.00
	WDM B190	A105	Meeting with Randall A. Pulman, Anna MacFarlane, and Leslie Hyman regarding case strategy, adversary actions to be filed, pleading requirements, assignment of tasks.	375.00	2.40	900.00
	GM B110	A103	continue research and prepare motion on [REDACTED] along with a proposed order	100.00	4.00	400.00
	RAP B190	A109	Hearing on 9019 Motion.	500.00	0.80	400.00

Lowe, Pat

01/31/2023

Account No: 1934-001M

Statement No. 232146

Deeproot - Policy Services, Inc. Case No. 21-51513, et al

					Rate	Hours	
	RAP	B190	A105	Office conference with W. Drew Mallender, Anna MacFarlane and Leslie S. Hyman regarding adversary proceeding strategy.	500.00	2.40	1,200.00
	GM	B110	A105	Communicate (in firm) with Randall A. Pulman and W. Drew Mallender regarding Motion on [REDACTED]	100.00	0.50	50.00
	GM	B110	A105	Email Randall A. Pulman and W. Drew Mallender Motion on [REDACTED]	100.00	0.10	10.00
	GM	B110	A101	prepare proposed order and exhibits-motion for [REDACTED]	100.00	1.00	100.00
	GM	B110	A101	Research on the case laws on [REDACTED]	100.00	3.00	300.00
11/02/2022	AKM	B180	A101	Review of Leslie S. Hyman research regarding res judicata.	275.00	0.50	137.50
	AKM	B180	A101	Conduct legal research regarding TUFTA and Ponzi presumption application; confer with Randall A. Pulman regarding same.	275.00	3.60	990.00
	WDM	B190	A104	Review/analyze Ponzi scheme cases and analysis; pleading requirements to overcome §12(b)(6).	375.00	0.50	187.50
	WDM	B110	A104	Review and comment on Motion for [REDACTED]. Meet with Garauv Mankotia regarding same.	375.00	0.50	187.50
	WDM	B190	A104	Review/analyze transactional detail of legal and professional fees paid by Debtors. Investigate professionals named in detail. Meet with Anna MacFarlane regarding same.	375.00	3.00	1,125.00
	GM	B110	A101	Confer with W. Drew Mallender for motion on [REDACTED]	100.00	0.30	30.00
	GM	B110	A101	Amend motion for [REDACTED] along with proposed order	100.00	2.00	200.00
	AKM	B180	A101	Confer with W. Drew Mallender regarding legal & professional claims analysis.	275.00	0.20	55.00
	WDM	B180	A104	Confer with Anna MacFarlane regarding legal and professional claims analysis.	375.00	0.20	75.00

Deeproot - Policy Services, Inc. Case No. 21-51513, et al

					Rate	Hours	
11/03/2022	GM	B110	A101	Continue prepare motion for [REDACTED] [REDACTED] along with proposed order	100.00	3.00	300.00
11/04/2022	GM	B110	A101	Continue prepare final draft motion for [REDACTED] along with proposed order	100.00	2.00	200.00
11/07/2022	AKM	B120	A101	In-office meeting with Randall A. Pulman, W. Drew Mallender and Greg Murray regarding financials and strategy.	275.00	1.70	467.50
	WDM	B120	A101	In office meeting with Greg Murray, Randall A. Pulman, Anna MacFarlane; review financial records to identify potential adversaries.	375.00	1.70	637.50
	RAP	B120	A101	In office meeting with Anna MacFarlane, W. Drew Mallender and Greg Murray; Review financial records, identify potential adversaries.	500.00	1.70	850.00
11/08/2022	WDM	B180	A104	Review/analyze 2016-2020 attorney correspondence with debtor, billing records, payment records.	375.00	2.00	750.00
	WDM	B190	A104	Review/analyze FINRA registration records and correspondence regarding State registrations.	375.00	1.10	412.50
	RAP	B180	A101	Review of Carlile Patchen & Murphy payments; office conference with DM regarding flow of moneys.	500.00	0.50	250.00
	WDM	B180	A101	Office conference with Randall A. Pulman regarding flow of monies.	375.00	0.30	112.50
11/09/2022	WDM	B180	A104	Review/analyze legal and professional consulting fees, correspondence with debtor, research companies and individuals, secretary of state records. Meet with Randall A. Pulman regarding findings of research.	375.00	2.80	1,050.00
	LSH	B120	A105	Conference with R. Pulman and A. MacFarland regarding duty of counsel drafting securities offerings.	450.00	0.20	90.00
	AKM	B120	A105	Conference with R. Pulman and Leslie S. Hyman regarding duty of counsel drafting			

Lowe, Pat

01/31/2023

Account No: 1934-001M

Statement No. 232146

Deeproot - Policy Services, Inc. Case No. 21-51513, et al

				Rate	Hours	
			securities offerings.	275.00	0.20	55.00
	RAP B120	A105	Conference with Anna McFarlane, W. Drew Mallender regarding duty of council drafting securities offerings.	500.00	0.20	100.00
	AKM B180	A101	Review of Policy Services Quickbooks for CPM entries.	275.00	0.40	110.00
	AKM B120	A101	Confer with Randall A. Pulman and Leslie S. Hyman in-office regarding potential adversary against Carlile Patchen & Murphy.	275.00	0.40	110.00
	RAP B120	A104	Confer with Anna MacFarlane and Leslie S. Hyman regarding potential adversary against Carlile Patchen & Murphy.	500.00	0.40	200.00
	LSH B120	A104	Confer with Anna MacFarlane and Randall A. Pulman regarding potential adversary against Carlile Patchen & Murphy.	450.00	0.40	180.00
11/10/2022	PR3 B110	A110	Manage data/files - Searching for PPMs; organizing CPM production; searching for Finder's information	110.00	2.10	231.00
	WDM B180	A104	Review/analyze legal and professional correspondence, agreements, fees and payments to determine potential adversary actions.	375.00	2.70	1,012.50
	WDM B190	A102	Legal Research	375.00	0.50	187.50
	WDM B190	A105	Meeting with Randall A. Pulman regarding analysis of legal and professional fees, correspondence and payments. Meeting with Ben Wulfe regarding review of Carlisle and Patchen documents, SEC production.	375.00	0.40	150.00
	LSH B120	A102	Legal research regarding duties of transactional lawyers.	450.00	2.30	1,035.00
	RAP B190	A105	In office meeting with W. Drew Mallender regarding analysis of legal professional fees.	500.00	0.20	100.00
11/11/2022	WDM B190	A102	Research, review and analyze Regulation D filings.	375.00	1.50	562.50
	WDM B180	A104	Review/analyze Luxor Financial Group correspondence with broker dealers and registered investment advisors. Prepare			

Account No: 1934-001M
Statement No. 232146

Deeproot - Policy Services, Inc. Case No. 21-51513, et al

				Rate	Hours	
	RAP	B180	A104	potential adversary case summary.	375.00	1.40 525.00
				In office meeting with W. Drew		
				Mallender regarding adversary against		
				Luxor Financial Group.	500.00	0.20 100.00
11/15/2022	AKM	B180	A101	Voicemail from Greg Murray (0.1) and		
				email regarding expert report (0.4).	275.00	0.50 137.50
11/16/2022	AKM	B120	A101	Voicemails from Wells Fargo paralegal		
				(0.1); returning call to paralegal and left		
				voicemail (0.1).	275.00	0.20 55.00
	RAP	B190	A107	Review of exhibit list and witness list for		
				11/22/22 hearing.	500.00	0.30 150.00
	WDM	B180	A104	Review/analyze and investigate potential		
				adversaries - professionals FactRight,		
				Jake Sharp Capital, legal counsel.	375.00	3.00 1,125.00
	WDM	B180	A103	Draft/revise potential case summary for		
				Luxor Financial	375.00	0.20 75.00
	WDM	B180	A104	Review/analyze FactRight due diligence		
				reports prepared for deeproot funds.	375.00	1.50 562.50
	WDM	B180	A103	Draft/revise subpoena duces tecum to		
				FactRight, LLC.	375.00	1.00 375.00
11/17/2022	AKM	B190	A101	Begin review of Greg Murray report.	275.00	0.10 27.50
11/21/2022	WDM	B180	A104	Review/analyze correspondence between		
				debtors and professionals for potential		
				adversary actions.	375.00	0.70 262.50
	WDM	B180	A108	Communicate (other external) with		
				Robert Lybrand regarding payment		
				received from Policy Services, services		
				performed.	375.00	0.60 225.00
	WDM	B180	A105	Meet with Randall A. Pulman concerning		
				adversary actions against professionals.	375.00	0.40 150.00
	WDM	B190	A103	Draft/revise subpoena duces tecum to		
				FactRight, LLC.	375.00	0.90 337.50
	RAP	B180	A105	In office meeting with W. Drew		
				Mallender regarding adversary actions		
				against professionals.	500.00	0.40 200.00
11/22/2022	AKM	B190	A101	Confer with W. Drew Mallender		
				regarding adversary complaints.	275.00	0.10 27.50
	RAP	B160	A108	Hearing on Fee Application for Murray;		

Deeproot - Policy Services, Inc. Case No. 21-51513, et al

				Rate	Hours	
			review of proposed order granting and denying same.	500.00	1.30	650.00
	WDM B110	A109	Appear for/attend hearing on Greg Murray fee application.	375.00	1.00	375.00
	WDM B110	A103	Draft/revise order approving Greg Murray fee application.	375.00	1.00	375.00
	WDM B110	A103	Draft/revise Supplement to Application to Employ Greg Murray.	375.00	1.30	487.50
	GM B110	A101	Attend Zoom Hearing on motion to confirm sale	100.00	1.00	100.00
	WDM B190	A101	Confer with Anna MacFarlane regarding adversary complaints.	375.00	0.10	37.50
11/28/2022	AKM B190	A101	Telephone call with Greg Murray regarding credit card report.	275.00	0.20	55.00
	WDM B190	A103	Draft/revise supplement to employment application for Greg Murray.	375.00	0.40	150.00
	WDM B190	A103	Draft/revise response to grand jury subpoena to Trustee.	375.00	0.40	150.00
	PR3 B110	A110	Manage data/files - Preparing Flashdrive for FBI	110.00	0.60	66.00
11/29/2022	WDM B190	A108	Review and approve index of documents to be produced in response to grand jury subpoena.	375.00	0.20	75.00
12/02/2022	AKM B190	A101	Confer with W. Drew Mallender regarding Greg Murray updated report and adversary complaints.	275.00	0.50	137.50
	WDM B190	A101	Confer with Anna MacFarlane regarding Greg Murray updated report and adversary complaints.	375.00	0.50	187.50
12/06/2022	AKM B190	A101	Meeting with Randall A. Pulman, W. Drew Mallender, and Greg Murray regarding report.	275.00	1.40	385.00
	WDM B120	A105	Meeting with Greg Murray, Randall A. Pulman and Anna Macfarlane to review forensic accountant report, discussion of findings and additional information required.	375.00	1.40	525.00
12/07/2022	WDM B190	A103	Draft Luxor Financial Complaint.	375.00	1.00	375.00

Account No: 1934-001M
Statement No. 232146

Deeproot - Policy Services, Inc. Case No. 21-51513, et al

				Rate	Hours	
01/04/2023	AKM B100	A101	Email to Greg Murray with PSI tax returns.	275.00	0.10	27.50
	RAP B190	A104	Review of tax returns for deeproot companies; forward to Murray.	500.00	0.50	250.00
01/11/2023	WDM B190	A104	Review/analyze legal research concerning [REDACTED].	375.00	2.80	1,050.00
01/12/2023	WDM B190	A103	Draft/revise motion for [REDACTED].	375.00	2.70	1,012.50
01/13/2023	RAP B160	A108	Review and approve G. Murray supplement to employment application.	500.00	0.30	150.00
01/16/2023	WDM B190	A103	Draft/revise motion for [REDACTED].	375.00	4.80	1,800.00
01/17/2023	WDM B190	A103	Draft/revise motion for [REDACTED].	375.00	7.50	2,812.50
01/18/2023	WDM B190	A103	Draft/revise Motion for [REDACTED]. Meet with Randall A. Pulman regarding same.	375.00	3.80	1,425.00
	RAP B190	A105	In office conference w W. Drew Mallender regarding motion to [REDACTED].	500.00	0.20	100.00
01/19/2023	RAP B110	A108	Review and edit of Motion to [REDACTED].	500.00	0.80	400.00
	WDM B190	A103	Draft/revise Motion for [REDACTED].	375.00	2.00	750.00
	WDM B190	A104	Review/analyze of Claims Registers and Estate bank accounts. Prepare spreadsheet analysis of claims, amounts, and Estate account balances.	375.00	2.50	937.50
01/20/2023	WDM B190	A103	Draft/revise proposed Order granting Motion for [REDACTED]. Email Motion and Order to Trustee for review and comment.	375.00	0.60	225.00
01/23/2023	AKM B190	A101	Confer with W. Drew Mallender			

Account No: 1934-001M
Statement No. 232146

Deeproot - Policy Services, Inc. Case No. 21-51513, et al

				Rate	Hours	
			regarding [REDACTED].	275.00	0.20	55.00
	AKM B190	A101	Confer with W. Drew Mallender regarding email from Goldman regarding Folio.	275.00	0.20	55.00
	WDM B190	A103	Draft/revise Motion for [REDACTED] and proposed Order.	375.00	3.30	1,237.50
	WDM B190	A101	Confer with Anna MacFarlane regarding [REDACTED].	375.00	0.20	75.00
01/24/2023	WDM B190	A105	Meet with Randall A. Pulman to discuss preparation of 3rd interim fee application.	375.00	0.20	75.00
	WDM B190	A103	Draft/revise Motion for [REDACTED].	375.00	0.40	150.00
	WDM B190	A103	Prepare motion for [REDACTED] and exhibits for filing with Court.	375.00	0.50	187.50
	RAP B190	A104	Review and edit of Motion for [REDACTED]; office conference with D. Mallender regarding same.	500.00	0.50	250.00
	RAP B190	A104	E-mail to Goldman Sachs regarding status of case.	500.00	0.30	150.00
01/26/2023	PR3 B110	A110	Preparing label matrix for Motion [REDACTED].	110.00	3.90	429.00
	AKM B160	A101	Reviewing TABS for fee app planning; internal conferences regarding same.	275.00	1.00	275.00
	WDM B160	A101	Confer with Anna MacFarlane regarding fee application.	375.00	0.30	112.50
01/27/2023	PR3 B110	A110	Preparing label matrix for Motion [REDACTED].	110.00	4.00	440.00
	AKM B190	A101	Internal conference regarding [REDACTED] and complaints.	275.00	0.30	82.50
01/31/2023	RAP B190	A104	Telephone conference with P. Lowe regarding update on adversary proceedings.	500.00	0.30	150.00
			For Legal Services Rendered		251.90	77,335.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	21.50	\$500.00	\$10,750.00

Lowe, Pat

01/31/2023

Account No: 1934-001M

Statement No. 232146

Deeproot - Policy Services, Inc. Case No. 21-51513, et al

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
W. Drew Mallender	142.30	375.00	53,362.50
Anna K. MacFarlane	17.20	275.00	4,730.00
PARA-3	38.80	110.00	4,268.00
Gaurav Mankotia	29.20	100.00	2,920.00
Leslie Hyman	2.90	450.00	1,305.00

Advances

10/26/2022	B110	E107	LSO #LSO0KGGV	40.20
11/02/2022	B110	E108	Postage - Mailout Notice of 2nd Fee App - Blend Document Technologies #56664B	923.06
11/14/2022	B110	E106	Online research - SOS Texas	3.09
01/17/2023	B110	E106	Online research - SOS Texas	1.03
			Total Advances	967.38
			Total Current Work	78,302.88

Courtesy Discount -7,000.00

Balance Due \$71,302.88

Past Due Amounts

<u>Stmt Date</u>	<u>Stmt #</u>	<u>Billed</u>	<u>Due</u>
04/30/2022	218945	200,000.00	26,732.68
			<u>26,732.68</u>

Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B100 Administration	27.50	0.00
B110 Case Administration	7933.00	967.38
B120 Asset Analysis and Recovery	5755.00	0.00
B160 Fee/Employment Applications	31455.00	0.00
B180 Avoidance Action Analysis	8280.00	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	23885.00	0.00
B100 Administration	<u>77,335.50</u>	<u>967.38</u>

Invoices are payable upon receipt.

EXHIBIT D-2

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231982
 Account No. 1934.002

Page: 1

(deeproot funds) SEC v. Robert J. Mueller, Deeproot Funds, L

Fees

				Rate	Hours	
12/20/2021	AKM B190	A101	Reviewing and analyzing SEC case documents; begin drafting adversary proceeding complaint.	275.00	6.00	1,650.00
12/23/2021	AKM B190	A101	Teams call with Randall A. Pulman and Leslie S. Hyman regarding strategy relating to SEC matter	275.00	0.80	220.00
10/05/2022	WDM B190	A108	Communicate (other external) by email with Bill Lewis regarding AUSA request for waiver of atty client privilege.	375.00	0.20	75.00
10/17/2022	LSH B120	A103	Draft/revise waiver of attorney-client privilege.	450.00	0.40	180.00
	WDM B190	A104	Review/analyze AUSA's proposed waiver of atty/client privilege.	375.00	0.20	75.00
10/18/2022	RAP B190	A104	Review of waiver document prepared by AUSA; office conference with L. Hyman regarding same; e-mail to AUSA.	500.00	1.00	500.00
	LSH B120	A105	Communicate (in firm) with R. Pulman regarding waiver of attorney-client privilege.	450.00	0.50	225.00
	LSH B120	A102	Research regarding in pari delicto defense.	450.00	1.10	495.00
10/19/2022	RAP B190	A104	Review and edit of attorney-client privilege waiver letter.	500.00	0.50	250.00
	LSH B120	A104	Review/analyze email from R. Pulman			

Lowe, Pat

Statement No. 231982
Account No 1934.002
Page: 2

(deeproot funds) SEC v. Robert J. Mueller, Deeproot

					Rate	Hours	
				regarding attorney-client privilege waiver.	450.00	0.10	45.00
10/24/2022	RAP	B190	A108	Telephone conference with US Attorney regarding privilege waiver.	500.00	0.30	150.00
11/07/2022	RAP	B190	A101	E-mail to counsel for SEC regarding status.	500.00	0.20	100.00
11/08/2022	AKM	B190	A101	Review of SEC Motion to Unfreeze Funds and order granting same.	275.00	0.30	82.50
	WDM	B190	A107	Communicate (other outside counsel) - Conference call with Randall A. Pulman, David Nasse, and Angie Dodd regarding settlement agreement, Rule 9019 Motion.	375.00	0.50	187.50
	WDM	B190	A104	Review/analyze SEC consent agreement, proposed judgement for filing in District Court, draft 9019 Motion.	375.00	1.00	375.00
	RAP	B190	A101	Conference call with SEC regarding status.	500.00	0.50	250.00
	LSH	B120	A104	Review/analyze order modifying asset freeze.	450.00	0.10	45.00
	LSH	B120	A108	Zoom conference with SEC counsel, R. Pulman and D. Mallender.	450.00	0.50	225.00
11/10/2022	WDM	B190	A103	Draft/revise 9019 Motion.	375.00	2.70	1,012.50
11/11/2022	AKM	B190	A101	Review of SEC Action scheduling order.	275.00	0.10	27.50
11/14/2022	RAP	B190	A107	Review of 9019 with SEC; office conference with D. Mallender regarding same; review of consent decree and judgment.	500.00	0.50	250.00
	WDM	B190	A103	Draft/revise 9019 Motion and Proposed Order.	375.00	3.20	1,200.00
	WDM	B190	A103	Draft/revise 9019 Motion and Order per Randall A. Pulman comments. Email draft motion and order to D Nasse and A Dodd for comment.	375.00	1.00	375.00
11/15/2022	WDM	B190	A104	Review/analyze D Nasse proposed edits to 9019 Motion and proposed Order. Send reply to D Nasse regarding same.			

Lowe, Pat

Statement No. 231982
Account No 1934.002
Page: 3

(deeproot funds) SEC v. Robert J. Mueller, Deeprroo

				Rate	Hours	
			Revise 9019 Motion and proposed Order.	375.00	0.30	112.50
11/28/2022	WDM B190	A107	Email correspondence with David Nasse regarding filing of 9019 Motion	375.00	0.20	75.00
	WDM B190	A104	Review 9019 Motion, Order and attachment prior to filing.	375.00	0.20	75.00
12/01/2022	WDM B190	A103	Review dismissal of relief parties from District Court action. Review and revise 9019 Motion and Order.	375.00	1.00	375.00
	RAP B190	A104	Telephone conference with SEC attorneys regarding status.	500.00	0.50	250.00
12/07/2022	LSH B120	A103	Draft/revise motion to deposit funds.	450.00	0.60	270.00
12/08/2022	RAP B190	A104	Review and approval of notice of appearance for filing.	500.00	0.30	150.00
	LSH B120	A103	Draft/revise notice of appearance.	450.00	0.80	360.00
12/09/2022	RAP B190	A104	Review and edit of Waiver of Attorney Client Privilege; send to client for signature; forward to US attorney.	500.00	0.70	350.00
12/19/2022	RAP B190	A107	Telephone conference with SEC counsel regarding waiver of attorney client privilege.	500.00	0.50	250.00
12/20/2022	BLL B190	A101	Attend Webex call with SEC counsel.	475.00	0.70	332.50
	RAP B190	A101	Telephone conference with SEC lawyers regarding bankruptcy filings and status of SEC case	500.00	0.30	150.00
12/23/2022	RAP B190	A101	Review of SEC pleading; telephone conference with Leslie S. Hyman and Anna MacFarlane regarding same; e-mail to SEC regarding same; telephone conference with Lowe regarding same.	500.00	1.50	750.00
01/05/2023	WDM B190	A104	Review/analyze SEC's Motion and Order to District Court to amend asset freeze.	375.00	0.30	112.50
01/06/2023	AKM B190	A101	Review of consent decree.	275.00	0.30	82.50

Lowe, Pat

Statement No. 231982
Account No 1934.002
Page: 4

(deeproot funds) SEC v. Robert J. Mueller, Deeproot

					Rate	Hours	
	RAP	B190	A108	Review of Motion to Enter Judgment and Consent; e-mail to L. Hyman regarding review; e-mail to SEC counsel regarding consent.	500.00	0.30	150.00
	LSH	B120	A104	Review/analyze and approve proposed motion for entry of agreed judgment and emails regarding same.	450.00	0.70	315.00
01/13/2023	LSH	B120	A104	Review/analyze text order granting motion to enter final judgment and entered final judgment.	450.00	0.10	45.00
01/16/2023	RAP	B190	A104	Review of Mueller's objection to Settlement Order; e-mail to SEC regarding same.	500.00	0.50	250.00
	LSH	B120	A104	Review/analyze objection to judgment filed by Mueller's counsel and emails regarding same.	450.00	0.10	45.00
01/18/2023	RAP	B190	A104	Review and edit of Response to Objection to Settlement.	500.00	0.30	150.00
	LSH	B120	A104	Review/analyze draft reply to objection to consent to enter judgment.	450.00	0.20	90.00
01/19/2023	RAP	B190	A108	Review of joint response to objection; telephone conference with SEC counsel regarding same.	500.00	0.30	150.00
01/20/2023	RAP	B190	A108	Telephone conference with counsel for SEC regarding waiver of attorney client privilege.	500.00	0.50	250.00
	LSH	B120	A108	Zoom conference with SEC counsel and R. Pulman.	450.00	0.20	90.00
01/24/2023	RAP	B190	A104	Review of waiver of attorney client privilege for SEC.	500.00	0.20	100.00
	LSH	B120	A104	Review/analyze SEC's edits to attorney-client privilege waiver.	450.00	0.20	90.00
01/27/2023	LSH	B120	A108	Review and respond to email from SEC counsel regarding privilege waiver.	450.00	0.10	45.00
				For Legal Services Rendered		33.60	13,460.00

Lowe, Pat

Statement No. 231982

Account No 1934.002

Page: 5

(deeproot funds) SEC v. Robert J. Mueller, Deepruo

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	8.90	\$500.00	\$4,450.00
W. Drew Mallender	10.80	375.00	4,050.00
Anna K. MacFarlane	7.50	275.00	2,062.50
Leslie Hyman	5.70	450.00	2,565.00
Byron L. LeFlore	0.70	475.00	332.50

Advances

12/07/2022	B110	E108	Postage - Mailout of 9019 Motion - Blend Document Technologies #56770B	1,001.84
			Total Advances	1,001.84
			Total Current Work	14,461.84
			Balance Due	<u>\$14,461.84</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	1001.84
B120	Asset Analysis and Recovery	2565.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	10895.00	0.00
B100	Administration	13,460.00	1,001.84

Invoices are payable upon receipt.

EXHIBIT D-3

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231983
 Account No. 1934.003

Page: 1

(deeproot funds) In Re deeproot Funds LLC re CCW Braun H

Fees

					Rate	Hours	
10/10/2022	RAP B130	A111	No objections, no bids; office conference with D. Mallender regarding same; review of witness and exhibit list.		500.00	0.50	250.00
	WDM B130	A106	Communicate (with client) with Pat Lowe to confirm no other offers to buy note.		375.00	0.10	37.50
	WDM B130	A107	Communicate (other outside counsel) with Ray Battaglia regarding no other bids, witness and exhibit list for hearing, review sale procedures.		375.00	0.40	150.00
	WDM B130	A103	Draft/revise 363 Sale Order. Email same to Ray Battaglia.		375.00	0.50	187.50
	WDM B130	A101	Office conference with Randall A. Pulman regarding no objections, no bids, preparation of witness list.		375.00	0.50	187.50
10/11/2022	WDM B130	A103	Draft/revise 363 Order to include waiver of rejection damages		375.00	0.40	150.00
10/12/2022	WDM B130	A103	Draft/revise 363 Order. Meet with Randall A. Pulman regarding changes to Order. Email to Ray Battaglia regarding same.		375.00	0.50	187.50
10/13/2022	RAP B130	A111	Hearing on Motion to Sell 2nd Lien Note.		500.00	2.00	1,000.00
	WDM B130	A109	Prepare for and attend hearing on 363 Sale Motion.		375.00	2.50	937.50
10/17/2022	WDM B130	A105	Meet with Randall A. Pulman regarding assignment of deed of trust and allonge.		375.00	0.10	37.50

Lowe, Pat

Statement No. 231983
Account No 1934.003
Page: 2

(deeproot funds) In Re deeproot Funds LLC re CC

				Rate	Hours	
	RAP	B130	A105 Meet in office with W. Drew Mallender regarding assignment of deed of trust and allonge.	500.00	0.10	50.00
10/21/2022	WDM	B130	A107 Telephone call with Ray Battaglia regarding closing.	375.00	0.20	75.00
	WDM	B130	A103 Draft/revise allonge, assignment of deed of trust, lost note affidavit.	375.00	0.70	262.50
10/24/2022	WDM	B130	A103 Draft/revise assignment and lost note affidavit per Pat Lowe's comments. Email to Ray Battaglia for review.	375.00	0.60	225.00
	WDM	B130	A105 Meet with Randall A. Pulman regarding closing, distribution of proceeds.	375.00	0.10	37.50
	WDM	B130	A106 Communicate (with client) with P Lowe regarding execution of documents and delivery to title company.	375.00	0.20	75.00
	WDM	B130	A107 Communicate (other outside counsel) with Ray Battaglia, docs approved by title company.	375.00	0.10	37.50
	WDM	B130	A103 Draft/revise closing instruction letter to title company.	375.00	0.40	150.00
	RAP	B130	A105 In office meeting with W. Drew Mallender regarding closing, distribution of proceeds.	500.00	0.10	50.00
10/25/2022	WDM	B130	A108 Email correspondence and telephone calls with title company regarding closing.	375.00	0.30	112.50
			For Legal Services Rendered		10.30	4,200.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	2.70	\$500.00	\$1,350.00
W. Drew Mallender	7.60	375.00	2,850.00

Expenses

10/13/2022	B110	E109	Local travel - Parking at courthouse for hearing - W. Drew Mallender			22.00
			Total Expenses			22.00

Lowe, Pat

Statement No. 231983
Account No 1934.003
Page: 3

(deeproot funds) In Re deeproot Funds LLC re CC

Total Current Work 4,222.00

Balance Due \$4,222.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	22.00
B130	Asset Disposition	4200.00	0.00
B100	Administration	<u>4,200.00</u>	<u>22.00</u>

Invoices are payable upon receipt.

EXHIBIT D-4

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231984
 Account No. 1934.004

Page: 1

(PSI) In Re: Deeproot - PSI and matters re MB Hale Ohana R

Fees

				Rate	Hours	
10/04/2022	AKM B190	A101	Review objection to Ohana Trust settlement and confer with Randall A. Pulman and W. Drew Mallender regarding same.	275.00	0.40	110.00
	AKM B190	A101	Review of order granting Ohana Trust 9019.	275.00	0.10	27.50
	WDM B180	A104	Review/analyze Objection to motion to approve Ohana settlement and confer w Anna MacFarlane and Randall A. Pulman.	375.00	0.40	150.00
	RAP B190	A104	Confer w Anna Macfarlane and W. Drew Mallender regarding objection to Ohana Trust settlement.	500.00	0.40	200.00
10/10/2022	WDM B190	A107	Communicate (other outside counsel) with David Nasse and Angela Dodd regarding order approving settlement agreement.	375.00	0.20	75.00
10/12/2022	RAP B190	A111	Review of e-mail from Snyder regarding status; respond to same.	500.00	0.20	100.00
	RAP B160	A111	Review of draft invoices; telephone conference with Lowe regarding fee applications.	500.00	1.00	500.00
10/13/2022	AKM B190	A101	Review and analysis of creditor objection to Ohana settlement.	275.00	0.30	82.50
10/24/2022	RAP B190	A108	Review of e-mail to Holly regarding			

Lowe, Pat

Statement No. 231984
Account No 1934.004
Page: 2

(PSI) In Re: Deeproot - PSI and matters re MB Hale

					Rate	Hours	
				hearing; e-mail regarding conferral.	500.00	0.20	100.00
10/31/2022	RAP	B190	A104	Telephone conference with P. Lowe regarding objection to 9019 Motion.	500.00	0.20	100.00
	RAP	B190	A104	Prepare for hearing on Objection to 9019 Order; review of documents.	500.00	1.00	500.00
11/01/2022	WDM	B190	A109	Prepare for and attend hearing on Motion to Reconsider order approving settlement.	375.00	1.20	450.00
	RAP	B190	A109	Hearing on Motion to Reconsider 9019 Settlement.	500.00	1.00	500.00
11/08/2022	RAP	B130	A101	Review of e-mail from Snyder regarding granting of Motion to unfreeze account.	500.00	0.20	100.00
11/15/2022	RAP	B190	A107	Receipt of settlement checks from Mueller, Sr.; forward to P. Lowe for deposit in account.	500.00	0.20	100.00
				For Legal Services Rendered		7.00	3,095.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	4.40	\$500.00	\$2,200.00
W. Drew Mallender	1.80	375.00	675.00
Anna K. MacFarlane	0.80	275.00	220.00

Advances

11/15/2022	B110	E123	Courier - LSO #LSO0KGGS	40.74
			Total Advances	40.74
			Total Current Work	3,135.74

Balance Due \$3,135.74

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	40.74
B130	Asset Disposition	100.00	0.00

Lowe, Pat

Statement No. 231984
Account No 1934.004
Page: 3

(PSI) In Re: Deeproot - PSI and matters re MB Hale

		<u>Fees</u>	<u>Expenses</u>
B160	Fee/Employment Applications	500.00	0.00
B180	Avoidance Action Analysis	150.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	2345.00	0.00
B100	Administration	3,095.00	40.74

Invoices are payable upon receipt.

EXHIBIT D-5

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231985
 Account No. 1934.005

Page: 1

(PSI) Cycladic LLC / Cycladic Int'l LLC / Thomas Andrew

Fees

				Rate	Hours	
10/07/2022	WDM B190	A107	Communicate (other outside counsel) with Steve Humeniuk regarding Cycladic production of documents.	375.00	0.10	37.50
10/11/2022	WDM B190	A107	Communicate (other outside counsel) with Steve Humeniuk regarding document production.	375.00	0.20	75.00
10/12/2022	WDM B190	A107	Communicate (other outside counsel) with Steve Humeniuk regarding production of documents.	375.00	0.30	112.50
10/17/2022	WDM B190	A105	Meeting with Randall A. Pulman concerning 2004 examination of Cycladic.	375.00	0.20	75.00
	RAP B190	A105	Confer with W. Drew Mallender regarding 2004 examination of Cycladic.	500.00	0.20	100.00
10/18/2022	WDM B190	A107	Communicate (other outside counsel) with Steve Humeniuk regarding 2004 examination of Thomas Andrew.	375.00	0.20	75.00
10/19/2022	RAP B190	A104	Office conference with D. Mallender and B. Wulfe regarding 2004 exam preparation.	500.00	0.50	250.00
	RAP B190	A104	Review of Thomas Andrews interview testimony.	500.00	1.50	750.00
	WDM B190	A105	Meet with Randall A. Pulman and B. Wulfe to review documents in preparation for 2004 examination of Cycladic.	375.00	0.50	187.50

Lowe, Pat

Statement No. 231985
Account No 1934.005
Page: 2

(PSI) Cycladic LLC / Cycladic Int'l LLC / Thomas

				Rate	Hours	
	PR3	B190	A110	Manage data/files - Reviewing Cycladic production and separating Basha policy documents and emails for deposition.	110.00	4.40 484.00
10/20/2022	AKM	B190	A101	Confer with Randall A. Pulman regarding 2004 examination.	275.00	0.10 27.50
	AKM	B120	A101	Confer with W. Drew Mallender regarding outline for 2004 examination; email to W. Drew Mallender regarding same.	275.00	0.30 82.50
	RAP	B190	A104	Prepare for 2004 Examination; review of documents for use as exhibits; telephone conference with opposing counsel regarding same.	500.00	2.50 1,250.00
	RAP	B190	A104	Prepare outline for examination; finish review of SEC interview.	500.00	2.00 1,000.00
	WDM	B190	A104	Review/analyze SEC document production, identify exhibits in preparation for 2004 examination.	375.00	3.00 1,125.00
	WDM	B190	A105	Meet with Randall A. Pulman and Ben Wulfe concerning review of SEC document production, exhibits for 2004 exam.	375.00	0.40 150.00
	WDM	B190	A107	Telephone call with Steve Humeniuk regarding 2004 examination, document production.	375.00	0.40 150.00
	WDM	B190	A104	Legal research regarding section 548 and TUFTA claims, elements to plead to avoid 12(b)(6). Prepare outline for 2004 examination	375.00	3.00 1,125.00
	PR3	B190	A110	Manage data/files - Preparing documents for deposition; Separating Dover Capital Strategies for review	110.00	4.80 528.00
10/21/2022	AKM	B190	A101	Meeting with Randall A. Pulman and W. Drew Mallender regarding 2004 examination of Tom Andrew (Cycladic).	275.00	0.60 165.00
	AKM	B120	A101	Zoom 2004 Examination of Thomas Andrew.	275.00	5.00 1,375.00
	RAP	B190	A104	2004 Examination of Thomas Andrews.	500.00	7.50 3,750.00
	PR3	B190	A104	2004 Examination of Thomas Andrew.	110.00	7.00 770.00
	WDM	B190	A105	Meet with Randall A. Pulman and Anna		

Lowe, Pat

Statement No. 231985
Account No 1934.005
Page: 3

(PSI) Cycladic LLC / Cycladic Int'l LLC / Thomas

				Rate	Hours	
			MacFarlane, prepare for 2004 examination. Discuss research topics and strategy for complaint.	375.00	1.00	375.00
	WDM B190	A104	Review/analyze SEC document production. Monitor 2004 examination of Thomas Andrew.	375.00	5.00	1,875.00
	WDM B190	A103	Draft/revise Motion to Compel production of documents.	375.00	2.00	750.00
	GM B120	A101	Zoom 2004 Examination of Thomas Andrew.	100.00	5.00	500.00
10/24/2022	WDM B190	A103	Draft/revise Motion to Compel.	375.00	1.00	375.00
	RAP B190	A108	Telephone conference with opposing counsel regarding Motion to Compel, document production and 2004 examination.	500.00	0.50	250.00
	RAP B190	A108	Telephone conference with P. Lowe regarding 2004 examination.	500.00	0.30	150.00
	RAP B190	A108	Review and edit of Motion to Compel.	500.00	0.50	250.00
10/25/2022	PR3 B190	A110	Manage data/files - Saving and going through Cycladic produced documents	110.00	4.10	451.00
	WDM B190	A107	Communicate (other outside counsel) with Steve Humeniuk regarding document production. Review production.	375.00	0.50	187.50
	RAP B190	A104	Review of partial production produced by Andrews;	500.00	0.50	250.00
10/27/2022	PR3 B190	A110	Manage data/files - Reviewing second round of Cycladic Production	110.00	1.30	143.00
	WDM B190	A104	Review/analyze Cycladic document production.	375.00	2.70	1,012.50
10/28/2022	PR3 B190	A110	Manage data/files - Working on and saving documents from deeproot virtual computers	110.00	2.40	264.00
	WDM B190	A104	Review/analyze confidential settlement offer from Cycladic.	375.00	0.30	112.50
10/31/2022	PR3 B190	A110	Manage data/files - managing Cycladic production	110.00	1.50	165.00
	RAP B190	A104	Telephone conference with P. Lowe			

Lowe, Pat

Statement No. 231985
Account No 1934.005
Page: 4

(PSI) Cycladic LLC / Cycladic Int'l LLC / Thomas

				Rate	Hours	
			regarding settlement offer at 200 K.	500.00	0.10	50.00
11/01/2022	WDM B190	A104	Review/analyze protective order and conduct legal research in connection with preparing response to grand jury subpoena, production of protected documents.	375.00	0.60	225.00
11/02/2022	WDM B190	A104	Review/analyze Cycladic document production.	375.00	2.40	900.00
11/03/2022	AKM B190	A101	Confer with W. Drew Mallender regarding document production.	275.00	0.20	55.00
	WDM B190	A104	Review/analyze document production received from Cycladic. Legal research concerning production of documents.	375.00	0.40	150.00
	WDM B190	A105	Communicate (in firm) with Randall A. Pulman regarding response to settlement offer from Cycladic.	375.00	0.20	75.00
	WDM B190	A104	Review/analyze document production. Email to Steve Humeniuk requesting compliance with FRCP 45.	375.00	2.60	975.00
	WDM B190	A103	Draft/revise response to settlement offer. Legal research regarding TUFTA, reasonably equivalent value, Ponzi scheme presumption.	375.00	2.50	937.50
	WDM B190	A105	Confer with Anna MacFarlane regarding document production.	375.00	0.20	75.00
11/04/2022	WDM B190	A104	Review/analyze document production received from Cycladic. Legal research concerning response to settlement offer.	375.00	4.00	1,500.00
11/07/2022	PR3 B190	A110	Manage data/files - Reviewing and downloading cycladic production	110.00	0.60	66.00
	WDM B190	A104	Review/analyze document production received from Cycladic.	375.00	3.20	1,200.00
	WDM B190	A107	Conference call with Tom Cunningham and Randall A. Pulman regarding settlement of Trustee's potential claims against Cycladic. Meet with Randall A. Pulman post call regarding same.	375.00	0.60	225.00

Lowe, Pat

Statement No. 231985
Account No 1934.005
Page: 5

(PSI) Cycladic LLC / Cycladic Int'l LLC / Thomas

				Rate	Hours	
	RAP	B190	A107	Conference call with Tom Cunningham and W. Drew Mallender regarding settlement of Trustee's potential claims against Cycladic. Meet with Randall A. Pulman post call regarding same.	500.00	0.60 300.00
11/09/2022	WDM	B190	A102	Legal Research regarding non-statutory insider status, fraudulent transfers, Sec. 544, 548 and TUFTA.	375.00	3.10 1,162.50
11/10/2022	WDM	B190	A102	Legal Research of monopsony, sole source seller; sale of debentures, broker dealer license requirements.	375.00	1.00 375.00
	WDM	B190	A104	Review/analyze document production.	375.00	0.50 187.50
11/11/2022	WDM	B190	A107	Conference call with Tom Cunningham regarding Cycladic settlement offer. Meet with Randall A. Pulman regarding same. Review revised settlement offer.	375.00	0.50 187.50
	RAP	B190	A107	Telephone conference with T. Cunningham regarding status of offers; telephone conference with P. Lowe regarding same.	500.00	0.50 250.00
	RAP	B190	A107	Review of settlement offer; forward to P. Lowe; telephone conference with P. Lowe regarding offer and counter-offer.	500.00	0.50 250.00
	RAP	B190	A107	E-mail to Cunningham regarding counter-offer.	500.00	0.30 150.00
11/14/2022	WDM	B190	A103	Draft/revise settlement agreement.	375.00	3.40 1,275.00
11/15/2022	WDM	B190	A103	Draft/revise Settlement Agreement.	375.00	5.30 1,987.50
11/16/2022	RAP	B190	A107	Review of draft settlement agreement; office conference with D. Mallender regarding same.	500.00	0.50 250.00
	WDM	B190	A103	Draft/revise Settlement Agreement.	375.00	1.60 600.00
	WDM	B190	A105	Meet with Randall A. Pulman, discuss revisions to settlement agreement. Email settlement agreement to Pat Lowe for review and approval.	375.00	0.40 150.00
	WDM	B190	A107	Email draft settlement agreement to Tom		

Lowe, Pat

Statement No. 231985
Account No 1934.005
Page: 6

(PSI) Cycladic LLC / Cycladic Int'l LLC / Thomas

					Rate	Hours	
			Cunningham.		375.00	0.10	37.50
11/21/2022	AKM B120	A101	Review of email from Tom Andrews counsel regarding settlement.		275.00	0.20	55.00
	WDM B190	A104	Review/analyze proposed revisions to Settlement Agreement.		375.00	0.70	262.50
11/23/2022	RAP B190	A108	Brief review of settlement agreement; forward to the client.		500.00	0.20	100.00
11/28/2022	WDM B190	A105	Meet with Randall A. Pulman to review comments to draft Settlement Agreement.		375.00	0.20	75.00
	WDM B190	A103	Draft/revise settlement agreement. Email revised agreement to parties for review.		375.00	1.20	450.00
	RAP B190	A101	Review and edit of settlement agreement; office conference with W. Drew Mallender regarding same.		500.00	1.00	500.00
11/29/2022	WDM B190	A103	Draft/revise settlement agreement per Trustee's comments.		375.00	0.20	75.00
11/30/2022	RAP B190	A101	Review of e-mails regarding settlement agreement; provide wiring instructions to Cycladic.		500.00	1.00	500.00
12/01/2022	WDM B190	A103	Draft/revise Settlement Agreement. Email to Steve Humeniuk for review.		375.00	1.40	525.00
	WDM B190	A107	Email correspondence with Steve Humeniuk regarding execution of settlement agreement.		375.00	0.30	112.50
	WDM B190	A102	Legal Research in connection with 9019 Motion.		375.00	3.00	1,125.00
	RAP B190	A104	Review of draft of Settlement Agreement; edit of same; office conference with D. Mallender regarding same; instructions to G. Mankotia regarding draft timeline; review of same.		500.00	1.00	500.00
	WDM B190	A104	Confer with Randall A. Pulman regarding settlement agreement.		375.00	0.20	75.00
12/02/2022	WDM B190	A107	Communicate (other outside counsel) with Steve Humeniuk and Pat Lowe				

Lowe, Pat

Statement No. 231985
Account No 1934.005
Page: 7

(PSI) Cycladic LLC / Cycladic Int'l LLC / Thomas

				Rate	Hours	
			regarding execution of settlement agreement, wire of funds.	375.00	0.30	112.50
	WDM B190	A102	Legal Research in connection with 9019 motion.	375.00	2.00	750.00
	WDM B190	A103	Draft/edit 9019 Motion. Meet with Randall A. Pulman and Anna MacFarlane regarding same (0.2).	375.00	4.20	1,575.00
	AKM B190	A105	Meet in office w Randall A. Pulman and W. Drew Mallender regarding 9019 Motion.	275.00	0.20	55.00
	RAP B190	A105	Meet in office w Anna MacFarlane and W. Drew Mallender regarding 9019 Motion.	500.00	0.20	100.00
12/03/2022	WDM B190	A103	Draft/revise 9019 Motion.	375.00	6.00	2,250.00
12/04/2022	WDM B190	A103	Draft/revise 9019 Motion and Order.	375.00	1.80	675.00
	WDM B190	A107	Communicate (other outside counsel) with Steve Humeniuk and Tom Cunningham, email draft 9019 Motion and Order.	375.00	0.20	75.00
12/06/2022	WDM B190	A104	Review/analyze comments and proposed changes to 9019 Motion and Order.	375.00	0.50	187.50
	RAP B190	A104	Email Pat Lowe regarding same.	500.00	0.30	150.00
01/05/2023	RAP B190	A108	Final review and approval of 9019 Motion; filing of same.			
			Review of order approving 9019 settlement; manage wire transfer process to Trustee.	500.00	0.30	150.00
			For Legal Services Rendered		135.80	44,786.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	22.50	\$500.00	\$11,250.00
W. Drew Mallender	75.60	375.00	28,350.00
Anna K. MacFarlane	6.60	275.00	1,815.00
PARA-3	26.10	110.00	2,871.00
Gaurav Mankotia	5.00	100.00	500.00

Lowe, Pat

Statement No. 231985

Account No 1934.005

(PSI) Cycladic LLC / Cycladic Int'l LLC / Thomas

Page: 8

Advances

11/16/2022	B190	E115	Deposition transcripts - Witness: Thomas Andrew, EUO - Lexitas #1373166	3,803.50
11/16/2022	B190	E115	Deposition transcripts - Video/Thomas Andrew, EUO - Lexitas #1373172	3,170.00
12/07/2022	B190	E108	Postage - Mailout of 9019 Motion - Blend Document Technologies #56770B	1,001.83
			Total Advances	7,975.33
			Total Current Work	52,761.33
			Balance Due	<u>\$52,761.33</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	2012.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	42773.50	7975.33
B100	Administration	44,786.00	7,975.33

Invoices are payable upon receipt.

EXHIBIT D-6

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231986
 Account No. 1934.006

Page: 1

(PSI) Claim against Jill R Winn - Net Winner

Fees

				Rate	Hours	
10/03/2022	AKM B180	A101	Confer with W. Drew Mallender regarding case.	275.00	0.10	27.50
	WDM B180	A107	Confer w Anna Macfarlane regarding case.	375.00	0.10	37.50
10/04/2022	AKM B180	A101	Continue drafting demand to Jill Winn regarding Randall A. Pulman comments and edits.	275.00	1.10	302.50
	AKM B180	A101	Transmit Jill Winn demand to client for approval.	275.00	0.10	27.50
	RAP B120	A104	Review and edit of demand letter to Winn; review of schedule; office conference with A. MacFarlane regarding same.	500.00	1.00	500.00
10/14/2022	AKM B120	A101	Review of correspondence regarding confidentiality order.	275.00	0.20	55.00
	WDM B180	A107	Communicate (other outside counsel) with Royal Lea regarding request for accounting analysis. Revise confidentiality agreement.	375.00	0.30	112.50
10/17/2022	AKM B120	A101	Email to Pat Lowe regarding mailed letter; updated tracking information.	275.00	0.10	27.50
	WDM B180	A104	Conference call with Randall A. Pulman and Royal Lea regarding settlement offer.	375.00	0.20	75.00
	RAP B180	A101	Conference call with W. Drew Mallender and Royal Lea regarding settlement offer.	500.00	0.20	100.00

Lowe, Pat

Statement No. 231986
Account No 1934.006
Page: 2

(PSI) Claim against Jill R Winn - Net Winner

					Rate	Hours	
10/20/2022	AKM	B120	A101	Confer with Randall A. Pulman regarding strategy.	275.00	0.30	82.50
	RAP	B120	A107	Confer with Anna McFarlane regarding strategy.	500.00	0.30	150.00
10/31/2022	RAP	B180	A104	Telephone conference with P. Lowe regarding offer and counter offer.	500.00	0.10	50.00
11/07/2022	AKM	B180	A101	Review of email correspondence from opposing counsel regarding settlement.	275.00	0.10	27.50
	RAP	B180	A101	Plan and prepare for Review of counter-offer from Winn; forward to Trustee.	500.00	0.20	100.00
12/12/2022	AKM	B180	A101	Review of emails regarding Jill Winn answer deadline.	275.00	0.20	55.00
01/04/2023	AKM	B180	A101	Confer with Randall A. Pulman regarding Winn case.	275.00	0.10	27.50
	RAP	B180	A101	Confer with Anna McFarlane regarding Winn case.	500.00	0.10	50.00
01/23/2023	AKM	B180	A101	Attention to emails regarding check.	275.00	0.20	55.00
01/25/2023	AKM	B180	A101	In-office conference with Randall A. Pulman regarding Jill Winn settlement.	275.00	0.20	55.00
	AKM	B180	A101	Continue drafting 9019 per Randall A. Pulman comments and edits; send to opposing counsel for review and comment.	275.00	0.50	137.50
	AKM	B180	A101	Review of file regarding Jill Winn; prepare draft settlement agreement.	275.00	1.50	412.50
	RAP	B180	A104	Telephone conference with P. Lowe regarding settlement with Winn; negotiations with opposing counsel regarding settlement.	500.00	1.00	500.00
	RAP	B180	A101	In office conference with Anna MacFarlane regarding settlement.	500.00	0.40	200.00
01/27/2023	AKM	B180	A101	Review of opposing counsel comments to 9019 Motion; email to Randall A. Pulman regarding same.	275.00	0.20	55.00

Lowe, Pat

Statement No. 231986

Account No 1934.006

Page: 3

(PSI) Claim against Jill R Winn - Net Winner

					Rate	Hours	
01/30/2023	RAP	B180	A104	Review of settlement agreement; e-mail to R. Lea regarding same.	500.00	0.30	150.00
				For Legal Services Rendered		9.10	3,372.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	3.60	\$500.00	\$1,800.00
W. Drew Mallender	0.60	375.00	225.00
Anna K. MacFarlane	4.90	275.00	1,347.50

Advances

10/24/2022	B110	E106	Online research - SOS Texas	2.00
11/01/2022	B110	E106	Online research - TransUnion	25.00
			Total Advances	27.00

Total Current Work 3,399.50

Balance Due \$3,399.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	27.00
B120	Asset Analysis and Recovery	815.00	0.00
B180	Avoidance Action Analysis	2557.50	0.00
B100	Administration	3,372.50	27.00

Invoices are payable upon receipt.

EXHIBIT D-7

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231987
 Account No. 1934.007

Page: 1

(PSI) Claims Against Robert J. Mueller, et al.

Fees

				Rate	Hours	
11/01/2022	AKM B180	A101	Confer with Randall A. Pulman regarding letter to Davis & Santos.	275.00	0.20	55.00
	RAP B180	A109	Office conference with L. Hyman, D. Mallender and A. MacFarlane regarding merits of combining defendants in multiple suits.	500.00	1.00	500.00
	LSH B120	A105	Conference with R. Pulman, D. Mallender, and A. MacFarlane regarding procedural decisions for suits against multiple defendants.	450.00	1.00	450.00
	LSH B120	A102	Legal research regarding compulsory counterclaims, joinder of claims, and res judicata.	450.00	2.10	945.00
	WDM B180	A105	Office conference with Leslie S. Hyman, Randall A. Pulman, and Anna MacFarlane regarding merits of combining defendants in multiple suits.	375.00	1.00	375.00
11/02/2022	LSH B120	A102	Research TUFTA and Ponzi scheme issues.	450.00	0.30	135.00
	LSH B120	A105	Conference with R. Pulman regarding TUFTA and Ponzi scheme research.	450.00	0.20	90.00
11/03/2022	AKM B120	A101	Continue drafting letter to Davis & Santos per Randall A. Pulman comments and edits.	275.00	0.40	110.00
11/04/2022	AKM B120	A101	Continue drafting demand to Davis & Santos per Randall A. Pulman comments			

Lowe, Pat

Statement No. 231987

Account No 1934.007

Page: 2

(PSI) Claims Against Robert J. Mueller, et al.

					Rate	Hours	
				and edits.	275.00	0.40	110.00
11/21/2022	RAP	B180	A108	Office conference with D. Mallender regarding preparation of suit.	500.00	0.30	150.00
11/28/2022	WDM	B180	A103	Draft Complaint.	375.00	1.00	375.00
11/29/2022	AKM	B120	A101	Continue drafting demand to Davis & Santos per Randall A. Pulman comments and edits.	275.00	0.40	110.00
	WDM	B180	A103	Draft/revise Complaint.	375.00	1.90	712.50
	RAP	B180	A101	Final review and edit of demand letter to Davis and Santos.	500.00	1.00	500.00
12/01/2022	AKM	B180	A101	Confer with W. Drew Mallender regarding adversary complaints.	275.00	0.20	55.00
	WDM	B180	A103	Draft Muller complaint.	375.00	1.30	487.50
12/02/2022	WDM	B180	A104	Review/analyze Greg Murray reports regarding personal expenses charged to credit cards.	375.00	0.50	187.50
12/03/2022	WDM	B180	A102	Legal Research required for drafting Mueller complaint.	375.00	0.70	262.50
	RAP	B180	A104	Office conference with D. Mallender regarding pleadings against Mueller.	500.00	0.50	250.00
	WDM	B180	A104	Office conference with Randall A. Pulman regarding pleading against Mueller.	375.00	0.50	187.50
12/04/2022	WDM	B180	A103	Draft/revise Mueller Complaint.	375.00	3.00	1,125.00
12/05/2022	WDM	B180	A103	Draft/revise Mueller Complaint.	375.00	11.50	4,312.50
	RAP	B180	A104	Respond to Carolinas Small's e-mail regarding 550 demand.	500.00	0.20	100.00
12/06/2022	WDM	B180	A103	Draft/revise Mueller Complaint.	375.00	9.90	3,712.50
	RAP	B180	A104	Telephone conference with Davis & Santos regarding demand for return of funds.	500.00	0.30	150.00
	RAP	B180	A104	Telephone conference with Caroline Small regarding 550 claims and tendering			

Lowe, Pat

Statement No. 231987

Account No 1934.007

Page: 3

(PSI) Claims Against Robert J. Mueller, et al.

				Rate	Hours	
			monies into court registry; e-mail to SEC regarding same.	500.00	0.50	250.00
12/07/2022	AKM B180	A101	Review of draft preliminary statement for adversary complaint.	275.00	0.40	110.00
	AKM B180	A101	Meet with Randall A. Pulman and W. Drew Mallender regarding adversary complaint; compiling exhibits regarding same.	275.00	1.50	412.50
	AKM B180	A101	Emails with Greg Murray regarding reporting.	275.00	0.20	55.00
	WDM B180	A105	Meetings with Randall A. Pulman and Anna MacFarlane, discussion regarding potential counts to bring against Mueller.	375.00	0.50	187.50
	WDM B180	A103	Draft/revise Mueller Complaint and prepare exhibits.	375.00	10.00	3,750.00
	RAP B180	A104	Review of Motion to Amend Freeze Order; telephone conference with Lowe regarding same; review of L. Hyman edits of Motion; forward to Caroline Small; final review and approval of Motion to Modify Asset Freeze.	500.00	2.00	1,000.00
12/08/2022	AKM B180	A101	Drafting Mueller complaint.	275.00	3.20	880.00
	WDM B180	A103	Review and revise complaint and exhibits per Randall A. Pulman comments in preparation for filing.	375.00	2.40	900.00
	RAP B180	A104	Review and edit of Plaintiff's Original Complaint; office conference with D. Mallender and A. MacFarlane regarding same; final approval for filing; forward copy to Mueller's counsel with request to accept services.	500.00	3.00	1,500.00
	WDM B180	A104	Confer with Randall A. Pulman and Anna MacFarlane regarding complaint.	375.00	0.50	187.50
12/09/2022	WDM B180	A103	Draft/revise potential case summaries for Mueller.	375.00	0.40	150.00
12/13/2022	AKM B180	A101	Review of email from Davis & Santos accepting service.	275.00	0.10	27.50

Lowe, Pat

Statement No. 231987
Account No 1934.007
Page: 4

(PSI) Claims Against Robert J. Mueller, et al.

					Rate	Hours	
01/02/2023	RAP	B180	A108	Telephone conference with opposing counsel regarding stay.	500.00	0.50	250.00
01/03/2023	RAP	B180	A108	Telephone conference with opposing counsel regarding stay.	500.00	0.50	250.00
01/05/2023	AKM	B180	A101	Review email regarding answer deadline extension.	275.00	0.10	27.50
	RAP	B180	A108	Review and approval of Motion to Extend answer date.	500.00	0.20	100.00
	WDM	B180	A104	Review/analyze Motion and Order requesting extension of time to file answer to complaint.	375.00	0.30	112.50
01/23/2023	WDM	B180	A104	Review/analyze defendant Mueller's Answer to Complaint.	375.00	0.60	225.00
01/25/2023	AKM	B180	A101	Attention to scheduling order deadlines and issues.	275.00	0.30	82.50
01/30/2023	AKM	B180	A101	Review and approval of statement regarding consent.	275.00	1.00	275.00
				For Legal Services Rendered		68.00	26,180.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	10.00	\$500.00	\$5,000.00
W. Drew Mallender	46.00	375.00	17,250.00
Anna K. MacFarlane	8.40	275.00	2,310.00
Leslie Hyman	3.60	450.00	1,620.00

Advances

12/08/2022	B110	E124	Pay.gov - Texas Western Bankruptcy Court ID #A23363351	350.00
			Total Advances	350.00
			Total Current Work	26,530.00

Lowe, Pat

Statement No. 231987

Account No 1934.007

Page: 5

(PSI) Claims Against Robert J. Mueller, et al.

Balance Due

\$26,530.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	1950.00	0.00
B180	Avoidance Action Analysis	24230.00	0.00
B100	Administration	26,180.00	350.00

Invoices are payable upon receipt.

EXHIBIT D-8

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231988
 Account No. 1934.008

Page: 1

(PSI) Potential Adversary Proceedings - Net Winners

Fees

				Rate	Hours	
10/12/2022	AKM B180	A101	In-office conference with Randall A. Pulman and W. Drew Mallender regarding strategy for adversary proceedings.	275.00	0.20	55.00
	AKM B180	A101	Continue reviewing net winner docs for adversary proceedings.	275.00	1.00	275.00
	WDM B180	A101	In office conference with Randall A. Pulman and Anna MacFarlane regarding strategy for adversary proceedings.	375.00	0.20	75.00
	RAP B180	A101	In office conference with W. Drew Mallender and Anna MacFarlane regarding strategy for adversary proceedings.	500.00	0.20	100.00
10/13/2022	AKM B180	A101	Continue reviewing and analyzing Greg Murray Quickbooks spreadsheets and drafting demand to finders.	275.00	2.80	770.00
10/14/2022	AKM B180	A101	Analyzing investor documents for net winner demands.	275.00	1.20	330.00
	AKM B100	A101	Updates to adversary tracking chart.	275.00	0.20	55.00
	AKM B120	A101	In-office conference with Randall A. Pulman regarding demands on finders and net winners.	275.00	0.30	82.50
	RAP B120	A101	In office conference with Anna MacFarlane regarding demands on finders and Net Winners.	500.00	0.30	150.00
10/17/2022	AKM B120	A101	In-office conference with Randall A.			

Lowe, Pat

Statement No. 231988

Account No 1934.008

Page: 2

(PSI) Potential Adversary Proceedings - Net Winner

				Rate	Hours	
			Pulman and MaryAnn Villa regarding strategy and next steps.	275.00	0.20	55.00
	AKM B120	A101	Analysis of client documents and Quickbooks records to determine potential net winners; correspondence with Greg Murray regarding same.	275.00	1.50	412.50
	RAP B120	A105	In office conference with Anna MacFarlane and MAV regarding strategy and next steps.	500.00	0.20	100.00
10/18/2022	AKM B120	A101	Analysis of net winners spreadsheets and client documents; confer with Randall A. Pulman and Pat Lowe regarding same.	275.00	1.30	357.50
	AKM B100	A101	Internal tracking updates for adversary demands mailed.	275.00	0.20	55.00
10/26/2022	AKM B120	A101	Confer with W. Drew Mallender regarding total amount of claims against net winners.	275.00	0.30	82.50
	WDM B120	A101	Confer with Anna McFarlane regarding claims against net winners.	375.00	0.30	112.50
11/01/2022	AKM B120	A101	Begin drafting adversary complaint against all net winners.	275.00	4.90	1,347.50
	AKM B180	A101	Confer with Randall A. Pulman regarding adversary against net winners.	275.00	0.50	137.50
	AKM B180	A101	Correspondence with Greg Murray regarding meeting.	275.00	0.20	55.00
	RAP B180	A107	Confer w Anna MacFarlane regarding adversary against Net Winner.	500.00	0.50	250.00
11/04/2022	AKM B180	A101	Continue drafting complaint against net winners.	275.00	0.20	55.00
11/07/2022	RAP B180	A101	Meeting with Greg Murray regarding report in Deeproot case.	500.00	1.00	500.00
	AKM B180	A101	Continue drafting complaint against net winners and conducting related legal research.	275.00	4.90	1,347.50
11/08/2022	AKM B180	A101	Continue drafting complaint against net winners and conducting related legal			

Lowe, Pat

Statement No. 231988

Account No 1934.008

Page: 3

(PSI) Potential Adversary Proceedings - Net Winner

					Rate	Hours	
				research.	275.00	6.80	1,870.00
11/09/2022	AKM	B180	A101	Confer with Randall A. Pulman in-office regarding draft of adversary complaint against net winners.	275.00	0.70	192.50
	AKM	B180	A101	Review of Randall A. Pulman comments to draft complaint.	275.00	0.10	27.50
	RAP	B180	A101	Confer with Anna McFarlane regarding adversary complaint.	500.00	0.70	350.00
11/10/2022	AKM	B180	A101	Continue drafting adversary complaint against net winners per Randall A. Pulman comments and edits.	275.00	2.60	715.00
11/14/2022	LSH	B120	A103	Continue drafting complaint against net winners.	450.00	4.00	1,800.00
	AKM	B180	A101	Confer with Leslie S. Hyman regarding net winners draft complaint.	275.00	0.20	55.00
	LSH	B180	A101	Confer with Anna McFarlane regarding net winners draft complaint.	450.00	0.20	90.00
11/15/2022	LSH	B120	A103	Continue drafting net winner complaint.	450.00	1.20	540.00
	AKM	B180	A101	Conduct legal research regarding constructive trusts.	275.00	2.00	550.00
	AKM	B180	A101	Continue drafting net winners complaint per Leslie S. Hyman comments and edits.	275.00	1.00	275.00
11/21/2022	RAP	B180	A108	Office conference with A. MacFarlane regarding status of suit.	500.00	0.50	250.00
	AKM	B180	A101	Confer with Randall A. Pulman regarding status of suit.	275.00	0.50	137.50
	AKM	B180	A101	Continue drafting complaint against net winners per Randall A. Pulman and Leslie S. Hyman comments and edits.	275.00	3.40	935.00
11/28/2022	AKM	B180	A101	Continue drafting complaint against net winners per Randall A. Pulman and Leslie S. Hyman comments and edits; conducting related legal research.	275.00	4.90	1,347.50
11/29/2022	RAP	B180	A101	Review and edit of draft of Original Complaint; office conference with AKM			

Lowe, Pat

Statement No. 231988

Account No 1934.008

Page: 4

(PSI) Potential Adversary Proceedings - Net Winner

				Rate	Hours	
			regarding edits to same.	500.00	1.00	500.00
	AKM	B180	A101 Continue drafting net winners complaint per Randall A. Pulman comments and edits (1.0); sending draft to Pat Lowe for review and approval (0.1).	275.00	1.10	302.50
11/30/2022	AKM	B180	A101 Confer with Pat Lowe via phone & email regarding net winners complaint.	275.00	0.40	110.00
	AKM	B180	A101 Continue drafting net winners complaint per Randall A. Pulman and Pat Lowe comments and edits.	275.00	0.80	220.00
	AKM	B180	A101 Confer with Randall A. Pulman regarding net winners complaint addition.	275.00	0.10	27.50
	RAP	B180	A101 Confer with Anna MacFarlane regarding net winners complaint.	500.00	0.10	50.00
12/06/2022	AKM	B180	A101 Analysis of PSI net winner chart from Greg Murray.	275.00	1.20	330.00
	RAP	B180	A104 Meeting with Greg Murray regarding report and findings; review of net winners paid from Policy Services.	500.00	1.00	500.00
	AKM	B180	A101 Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	1.40	385.00
12/07/2022	RAP	B180	A104 Final review and signature of Original Complaint.	500.00	0.30	150.00
	AKM	B180	A101 Continue drafting adversary complaint per RAP comments and edits.	275.00	0.40	110.00
12/09/2022	RAP	B180	A104 Telephone conference with opposing counsel regarding service of pleading.	500.00	0.20	100.00
01/05/2023	RAP	B180	A108 Telephone conference with opposing counsel regarding settlement.	500.00	0.30	150.00
01/25/2023	AKM	B180	A101 In-office conference with Randall A. Pulman regarding status of remaining net winners.	275.00	0.30	82.50
			For Legal Services Rendered		60.00	18,912.50

Lowe, Pat

Statement No. 231988

Account No 1934.008

(PSI) Potential Adversary Proceedings - Net Winner

Page: 5

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	6.30	\$500.00	\$3,150.00
W. Drew Mallender	0.50	375.00	187.50
Anna K. MacFarlane	47.80	275.00	13,145.00
Leslie Hyman	5.40	450.00	2,430.00

Advances

10/13/2022	B110	E106	Online research - SOS Texas	3.00
10/14/2022	B110	E106	Online research - TransUnion	110.00
10/18/2022	B110	E106	Online research - TransUnion	30.00
10/18/2022	B110	E106	Online research - TransUnion	75.00
12/07/2022	B110	E124	Pay.gov - Filing fee for Adversary Complaint	350.00
Total Advances				568.00

Total Current Work 19,480.50

Balance Due \$19,480.50

Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B100 Administration	110.00	0.00
B110 Case Administration	0.00	568.00
B120 Asset Analysis and Recovery	5040.00	0.00
B180 Avoidance Action Analysis	13762.50	0.00
B100 Administration	18,912.50	568.00

Invoices are payable upon receipt.

EXHIBIT D-9

**No fees or
expenses in
this matter**

EXHIBIT D-10

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231989
 Account No. 1934.010

Page: 1

(deeproot Tech) Sale of Pinball Property

Fees

				Rate	Hours	
10/07/2022	WDM B190	A104	Review/analyze Pat Autry's comments and requested changes to purchase and sale agreement.	375.00	0.50	187.50
10/10/2022	WDM B130	A103	Draft/revise Pinball purchase and sale agreement.	375.00	0.50	187.50
10/11/2022	WDM B130	A103	Draft/revise motion to sell pinball property. Draft orders. Legal research related to section 363 sales	375.00	4.30	1,612.50
10/13/2022	WDM B130	A103	Draft/revise pinball purchase and sale agreement, motion to approve sale, coordinate documents with Draper 5 settlement agreement. (3.5) Tel with Chris Turner to confirm ability to remove property from premises by November 30, 2022. (0.2) Email revised documents to P Autry. (0.1)	375.00	3.80	1,425.00
10/14/2022	WDM B130	A107	Communicate (other outside counsel) with Pat Autry regarding revisions to documents.	375.00	0.10	37.50
	WDM B130	A104	Review/analyze letter from Chris Turner to Trustee regarding pinball sale procedures. Reply to C Turner regarding same.	375.00	0.30	112.50
10/17/2022	RAP B130	A104	Telephone conference with C. Turner			

Lowe, Pat

Statement No. 231989
Account No 1934.010
Page: 2

(deeproot Tech) Sale of Pinball Property

				Rate	Hours	
			regarding terms of sale of PinBall property.	500.00	0.50	250.00
	WDM B130	A105	In office conference with Randall A. Pulman regarding pinball motion to sell.	375.00	0.20	75.00
	WDM B130	A108	Conference call with Randall A. Pulman and Chris Turner regarding sale procedures.	375.00	0.50	187.50
	RAP B130	A105	In office conference with W. Drew Mallender regarding motion to sell pinball property.	500.00	0.20	100.00
10/18/2022	WDM B130	A107	Conference call with Randall A. Pulman and Pat Autry regarding pinball purchase.	375.00	0.20	75.00
	RAP B130	A107	Conference call with Pat Autry and W. Drew Mallender regarding pinball property purchase.	500.00	0.20	100.00
10/20/2022	WDM B130	A108	Telephone call with C Turner regarding comments to purchase and sale agreement.	375.00	0.20	75.00
10/21/2022	WDM B130	A103	Draft/revise purchase and sale agreement, motion to approve sale and 363 order. Email to C Turner and P Autry for review.	375.00	0.60	225.00
10/24/2022	WDM B130	A108	Communicate (other external) with Chris Turner regarding comments to revised agreement and sale procedures. Meet with Randall A. Pulman regarding same.	375.00	0.50	187.50
	WDM B130	A103	Prepare documents for execution and filing. Meet with Randall A. Pulman regarding same.	375.00	1.80	675.00
	WDM B130	A103	Draft/revise expedite motions. Prepare exhibits for filing with court.	375.00	2.20	825.00
	RAP B130	A108	Review and receipt of \$25,000 deposit by Turner Logics for sale; e-mail to all parties regarding same.	500.00	0.20	100.00
10/25/2022	WDM B130	A103	Draft/revise motion to expedite. Confer with Jim Rose regarding filing of expedite motion.	375.00	0.90	337.50

Lowe, Pat

Statement No. 231989

Account No 1934.010

Page: 3

(deeproot Tech) Sale of Pinball Property

				Rate	Hours	
11/01/2022	WDM B190	A109	Prepare for and attend hearing on Motion to Approve Sale Procedures for sale of Pinball Property.	375.00	1.20	450.00
	WDM B130	A103	Draft/revise order, sale procedures and notice in accordance with the Courts' ruling at hearing. Email revised docs to P Autry for review and approval; revise docs per comments received.	375.00	1.30	487.50
	GM B190	A109	Attend via Dial-in hearing on Motion to Approve Sale Procedures for sale of Pinball Property	100.00	1.50	150.00
	GM B190	A105	Confer with Mary Ann to discuss and debrief Motion to Approve Sale Procedure for sale of Pinball Property	100.00	0.50	50.00
	RAP B130	A109	Hearing on Motion to Sell.	500.00	1.00	500.00
	WDM B190	A103	Draft/revise 2004 Notice and Subpoena DT to Adam Sidwell.	375.00	0.50	187.50
11/03/2022	WDM B190	A103	Draft/revise 2004 Notices and Subpoenas to Adam Sidwell and to Premier Global Corp.	375.00	0.40	150.00
11/08/2022	WDM B130	A108	Communicate (other external) - Email correspondence with C Turner regarding Intertek, recovery of pinball machine.	375.00	0.20	75.00
11/11/2022	WDM B130	A108	Telephone call with Chris Turner regarding SEC subpoena, Intertek pinball issue.	375.00	0.50	187.50
11/15/2022	WDM B190	A108	Telephone call with Chris Turner regarding Intertek, possible destruction of pinball machine.	375.00	0.30	112.50
11/16/2022	RAP B130	A107	Review of e-mail regarding destruction of pinball machine; e-mail to P. Autry confirming that the purchaser has the rights to pursue the claim for wrongful destruction of pinball machines.	500.00	0.30	150.00
	RAP B190	A107	Review of e-mail from landlord payment of settlement monies by Trustee; respond to same.	500.00	0.20	100.00

Lowe, Pat

Statement No. 231989

Account No 1934.010

Page: 4

(deeproot Tech) Sale of Pinball Property

				Rate	Hours	
	WDM B190	A104	Review/analyze Intertek agreement and correspondence. Email correspondence regarding same to Chris Turner.	375.00	0.60	225.00
	WDM B130	A104	Review/analyze proposed changes to proposed order approving pinball sale.	375.00	0.20	75.00
	WDM B130	A107	Email correspondence with C Turner and C Hale regarding pickup of pinball property.	375.00	0.20	75.00
11/18/2022	RAP B130	A107	Review of e-mail regarding sale of patents subject to injunction; respond to same.	500.00	0.30	150.00
	WDM B190	A108	Email correspondence with C Turner regarding Intertek, destruction of pinball machine.	375.00	0.20	75.00
	WDM B190	A107	Telephone call with Eric Vogeler regarding response to Adam Sidwell Notice of 2004 Exam.	375.00	0.30	112.50
11/21/2022	RAP B130	A108	Office conference with D. Mallender and staff regarding preparation for hearing; telephone conference with P. Autry regarding claims on patents.	500.00	0.50	250.00
	WDM B190	A104	Review/analyze email correspondence from Zidware counsel regarding patents.	375.00	0.20	75.00
	WDM B130	A107	Communicate (other outside counsel) with P Autry regarding revisions to proposed order.	375.00	0.20	75.00
	WDM B130	A108	Confer with Randall A. Pulman regarding preparation for hearing.	375.00	0.30	112.50
	WDM B190	A107	Telephone call with Eric Vogeler regarding 2004 Exam and subpoena of Adam Sidwell.	375.00	0.50	187.50
	WDM B190	A104	Review/analyze Design Services Agreement between deeproot Studios and Future House Publishing.	375.00	0.30	112.50
11/22/2022	RAP B130	A108	Hearing on Motion to Confirm Sale.	500.00	2.50	1,250.00
	WDM B130	A109	Appear for/attend hearing on pinball sale.	375.00	2.50	937.50
	WDM B130	A103	Draft/revise Order to approve pinball property sale.	375.00	0.70	262.50
	WDM B130	A107	Email correspondence with P Autry regarding revisions to sale order.	375.00	0.20	75.00

Lowe, Pat

Statement No. 231989
Account No 1934.010
Page: 5

(deeproot Tech) Sale of Pinball Property

					Rate	Hours	
	RAP	B130	A104	Review updated order for submission.	500.00	0.20	100.00
11/23/2022	RAP	B130	A108	Manage wire transfer process for \$50,000 in sale proceeds.	500.00	0.30	150.00
11/28/2022	WDM	B190	A108	Telephone call with Chris Turner regarding retrieval of IP from Adam Sidwell.	375.00	0.20	75.00
	WDM	B190	A107	Review and reply to email from Eric Vogeler regarding sale of IP to Turner Logic, transfer of IP from Future House Publishing to Turner Logic.	375.00	0.20	75.00
	WDM	B190	A104	Review/analyze Design Services Agreement between deeproot Studios and Future House Studios.	375.00	0.60	225.00
	WDM	B190	A105	Meeting with Randall A. Pulman regarding transfer of IP from Future House Studios to Turner Logic.	375.00	0.20	75.00
	WDM	B190	A104	Review/analyze filed schedules for deeproot Studios and deeproot Tech; analysis of payments to Future House Publishing.	375.00	1.50	562.50
	WDM	B190	A107	Telephone call with Eric Vogeler regarding transfer of IP to Chris Turner/Turner Logic.	375.00	0.30	112.50
	RAP	B190	A105	In office meeting with W. Drew Mallender regarding transfer of pinball IP.	500.00	0.20	100.00
11/29/2022	WDM	B130	A108	Email correspondence with C Turner regarding transfer of data by Future House Publishing.	375.00	0.20	75.00
12/01/2022	WDM	B130	A108	Email correspondence with C Turner regarding retrieval of computers. Meet with Ben Wulfe regarding same.	375.00	0.20	75.00
12/19/2022	WDM	B190	A104	Review/analyze correspondence between C Turner and A Sidwell regarding turn over of pinball IP. Meet with Randall A. Pulman regarding same. Re Notice Adam Sidwell for 2004 exam.	375.00	0.40	150.00
	WDM	B190	A108	Communicate (other external) with Chris			

Lowe, Pat

Statement No. 231989

Account No 1934.010

Page: 6

(deeproot Tech) Sale of Pinball Property

				Rate	Hours	
	RAP	B190	A105	Turner regarding turn over of pinball IP.	375.00	0.30 112.50
				In office meeting with W. Drew		
				Mallender regarding turnover of Pinball		
				IP.	500.00	0.20 100.00
12/20/2022	WDM	B190	A108	Communicate (other external) with Chris		
				Turner and Eric Vogeler regarding turn		
				over of pinball IP.	375.00	0.30 112.50
12/29/2022	WDM	B190	A108	Communicate (other external) with Eric		
				Vogeler and Chase Adams regarding		
				Adam Sidwell, turn over of pinball IP.	375.00	0.40 150.00
01/04/2023	WDM	B190	A108	Communicate (other external) Chris		
				Turner regarding status of turnover of IP		
				by Adam Sidwell.	375.00	0.30 112.50
01/06/2023	WDM	B190	A107	Communicate (other outside counsel)		
				with Eric Vogeler regarding turnover of		
				deeproot IP to Turner Logic.	375.00	0.40 150.00
01/12/2023	WDM	B190	A108	Communicate (other external) with Chris		
				Turner regarding turnover of deeproot IP.	375.00	0.20 75.00
01/16/2023	WDM	B190	A107	Communicate (other outside counsel)		
				with Eric Vogeler regarding turnover of		
				deeproot IP.	375.00	0.20 75.00
01/18/2023	WDM	B190	A108	Communicate (other external) with Chris		
				Turner regarding turnover of deeproot IP		
				by Adam Sidwell.	375.00	0.20 75.00
01/23/2023	WDM	B190	A108	Communicate (other external) with Chris		
				Turner regarding Intertec and Adam		
				Sidwell.	375.00	0.20 75.00
01/24/2023	WDM	B190	A108	Telephone call to Eric Vogeler regarding		
				turnover of deeproot IP. Telephone call		
				with Chris Turner regarding same.	375.00	0.30 112.50
01/26/2023	WDM	B190	A108	Email correspondence with Chris Turner		
				concerning Adam Sidwell; meeting to		

Lowe, Pat

Statement No. 231989

Account No 1934.010

Page: 7

(deeproot Tech) Sale of Pinball Property

				Rate	Hours	
			discuss how to proceed.	375.00	0.20	75.00
01/30/2023	WDM B190	A108	Conference call with Randall A. Pulman, Pat Autry and Chris Turner regarding strategy for turnover of deeproot IP in possession of Adam Sidwell/Future House Studios.	375.00	1.00	375.00
	RAP B190	A104	Telephone conference with C. Turner and P. Autry regarding remedies for IP and insurance issues.	500.00	1.00	500.00
	RAP B190	A106	Conference call with W. Drew Mallender, Pat Autry and C. Turner regarding Deeproot IP in Possession of Adam Sidwell.	500.00	1.00	500.00
			For Legal Services Rendered		46.00	17,800.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	8.80	\$500.00	\$4,400.00
W. Drew Mallender	35.20	375.00	13,200.00
Gaurav Mankotia	2.00	100.00	200.00

Advances

10/26/2022	B110	E124	Filing fee - Pay.gov - Filing fee - 363 Sale Motion regarding Pinball property	188.00
10/27/2022	B110	E108	Postage - Mailout of Motions - Blend Document Technologies #56653B	2,147.76
11/08/2022	B110	E108	Postage - Mailout of Sale Notice & Procedures - Blend Document Technologies #56679B	1,115.25
			Total Advances	3,451.01
			Total Current Work	21,251.01
			Balance Due	\$21,251.01

Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	0.00	3451.01

Lowe, Pat

Statement No. 231989

Account No 1934.010

Page: 8

(deeproot Tech) Sale of Pinball Property

		<u>Fees</u>	<u>Expenses</u>
B130	Asset Disposition	11650.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	6150.00	0.00
B100	Administration	<u>17,800.00</u>	<u>3,451.01</u>

Invoices are payable upon receipt.

EXHIBIT D-11

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231990
 Account No. 1934.011

Page: 1

(PSI) Potential Adversary Proceedings - Finders

Fees

				Rate	Hours	
06/03/2022	WDM B180	A101	Review and analysis of Finders' records concerning potential adversary filings	375.00	1.20	450.00
10/18/2022	AKM B120	A101	Confer with Randall A. Pulman and Leslie S. Hyman regarding in pari delicto research.	275.00	0.20	55.00
	RAP B180	A104	Review of Murray's report; edit of same.	500.00	0.50	250.00
	RAP B180	A105	Confer with Anna MacFarlane and Leslie S. Hyman regarding pari delicto research.	500.00	0.20	100.00
	AKM B180	A105	Confer with Randall A. Pulman and Leslie S. Hyman regarding pari delicto research.	275.00	0.20	55.00
10/19/2022	AKM B120	A101	Confer with Randall A. Pulman regarding demands status.	275.00	0.20	55.00
	AKM B180	A101	Reviewing QuickBooks and summarizing remaining demands to be sent to finders; reviewing bankruptcy code for relevant venue code provisions.	275.00	0.50	137.50
10/24/2022	AKM B120	A101	Confer with Randall A. Pulman regarding case status and next steps.	275.00	0.10	27.50
	RAP B120	A104	Confer w Anna MacFarlane regarding case status.	500.00	0.10	50.00
10/26/2022	AKM B120	A101	Confer with Randall A. Pulman regarding case status and updates.	275.00	0.30	82.50
	AKM B100	A101	Attention to case management.	275.00	0.70	192.50
	RAP B120	A104	Confer with Anna MacFarlane regarding			

Lowe, Pat

Statement No. 231990
Account No 1934.011
Page: 2

(PSI) Potential Adversary Proceedings - Finders

					Rate	Hours	
				case status update.	500.00	0.30	150.00
10/31/2022	AKM B180	A101	Review of Greg Murray expert report.		275.00	0.50	137.50
11/02/2022	AKM B180	A101	Conduct legal research regarding life settlements as securities.		275.00	0.40	110.00
	AKM B120	A101	Email to Randall A. Pulman regarding update on Finders phone calls after demands.		275.00	0.20	55.00
11/03/2022	AKM B120	A101	Attention to correspondence regarding letter agreements.		275.00	0.30	82.50
	AKM B120	A101	Attention to case and file management.		275.00	0.50	137.50
	AKM B120	A101	Correspondence with Greg Murray regarding meeting.		275.00	0.10	27.50
11/07/2022	RAP B180	A101	Office conference with AKM regarding conversation with lawyer for several finders in Arizona area.		500.00	0.30	150.00
	AKM B180	A104	Office conference with Randall A. Pulman regarding lawyer for finders in Arizona.		275.00	0.30	82.50
11/11/2022	WDM B180	A104	Review/analyze Luxor Financial Group correspondence, consulting agreements. Meet with Randall A. Pulman regarding potential adversary.		375.00	1.20	450.00
11/14/2022	AKM B120	A101	Conduct limitations research for avoidance actions under TUFTA and 544.		275.00	0.20	55.00
11/21/2022	AKM B180	A101	Review and organization of potential case summaries to begin preparing adversary complaints.		275.00	1.20	330.00
	AKM B180	A101	In-office conference with Randall A. Pulman and W. Drew Mallender regarding strategy and next steps.		275.00	0.40	110.00
	WDM B180	A104	In-office conference with Randall A. Pulman and Anna MacFarlane regarding strategy and next steps.		375.00	0.40	150.00
	RAP B180	A104	In-office conference with W. Drew Mallender and Anna MacFarlane				

Lowe, Pat

Statement No. 231990

Account No 1934.011

Page: 3

(PSI) Potential Adversary Proceedings - Finders

					Rate	Hours	
				regarding strategy and next steps.	500.00	0.40	200.00
11/29/2022	AKM B120	A101	Email Pat Lowe case summary and draft demand (Wirth/First Fidelity).		275.00	0.10	27.50
12/03/2022	AKM B180	A101	Confer with Randall A. Pulman and W. Drew Mallender regarding Greg Murray report strategy and next steps.		275.00	1.30	357.50
	RAP B180	A104	Review of Greg Murray report; office conference with D. Mallender and A. MacFarlane regarding same.		500.00	1.30	650.00
	WDM B180	A104	Office conference with Randall A. Pulman and Anna MacFarlane regarding Greg Murray report, strategy and next steps.		375.00	1.30	487.50
12/05/2022	RAP B180	A104	Review and edit of draft of form of Complaint against Finders; office conference with A. MacFarlane regarding same.		500.00	1.00	500.00
12/08/2022	AKM B180	A101	Review of Luxor Financial documents and correspondence.		275.00	1.30	357.50
12/28/2022	AKM B180	A101	Confer with Gaurav Mankotia regarding adversary complaints.		275.00	0.30	82.50
	AKM B180	A101	Confer with Randall A. Pulman regarding status of adversary proceeding complaints.		275.00	0.10	27.50
	GM B180	A101	Confer with Anna regarding adversary complaints.		100.00	0.30	30.00
01/04/2023	AKM B180	A101	Creating adversary answer deadline tracking chart.		275.00	0.30	82.50
	RAP B180	A104	Office conference with A. MacFarlane regarding venue provisions on adversaries.		500.00	0.50	250.00
01/05/2023	AKM B180	A101	Update answer tracking chart.		275.00	0.20	55.00
01/06/2023	AKM B180	A101	Meeting with team regarding scheduling and handling deadlines for adversary				

Lowe, Pat

Statement No. 231990

Account No 1934.011

Page: 4

(PSI) Potential Adversary Proceedings - Finders

				Rate	Hours	
			proceedings.	275.00	0.50	137.50
	AKM B180	A101	Updating answer tracking chart.	275.00	0.50	137.50
	RAP B180	A108	Office conference with staff regarding organization of each adversary and necessary filings.	500.00	0.50	250.00
01/09/2023	AKM B180	A101	Conduct legal research regarding venue question.	275.00	2.80	770.00
	AKM B180	A101	Confer with Randall A. Pulman regarding research results.	275.00	0.10	27.50
	AKM B180	A101	Confer with Gaurav regarding research results and assign new adversaries for preparation.	275.00	0.30	82.50
01/11/2023	AKM B180	A101	Confer with Gaurav Mankotia regarding complaints.	275.00	0.10	27.50
01/16/2023	AKM B180	A101	Emails with Pat Lowe regarding venue issue; review of document he sent.	275.00	0.30	82.50
01/18/2023	AKM B180	A101	Attention to scheduling orders.	275.00	0.20	55.00
01/24/2023	AKM B180	A101	Attention to case administration.	275.00	0.50	137.50
01/31/2023	AKM B180	A101	Attention to filing tasks for 21 adversary proceedings.	275.00	0.60	165.00
			For Legal Services Rendered		25.30	8,462.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	5.10	\$500.00	\$2,550.00
W. Drew Mallender	4.10	375.00	1,537.50
Anna K. MacFarlane	15.80	275.00	4,345.00
Gaurav Mankotia	0.30	100.00	30.00

Advances

10/17/2022	B110	E106	Online research - TransUnion	50.00
10/19/2022	B110	E106	Online research - TransUnion	405.00
10/20/2022	B110	E106	Online research - TransUnion	265.00
10/20/2022	B110	E106	Online research - SOS Texas	5.00

Lowe, Pat

Statement No. 231990

Account No 1934.011

Page: 5

(PSI) Potential Adversary Proceedings - Finders

10/24/2022	B110	E106	Online research - TransUnion	250.00
			Total Advances	975.00
			Total Current Work	9,437.50
			Balance Due	<u>\$9,437.50</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B100	Administration	192.50	0.00
B110	Case Administration	0.00	975.00
B120	Asset Analysis and Recovery	805.00	0.00
B180	Avoidance Action Analysis	7465.00	0.00
B100	Administration	8,462.50	975.00

Invoices are payable upon receipt.

EXHIBIT D-12

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231991
 Account No. 1934.012

Page: 1

Claims against Financial Horizon Concepts LLC - Finder

Fees

					Rate	Hours	
10/14/2022	RAP	B180	A111	Review of demand letter and attachments; e-mail to A. MacFarlane regarding same.	500.00	0.50	250.00
	AKM	B120	A101	Continue drafting demand letter to Financial Horizon Concepts, LLC & downline finders per Randall A. Pulman comments and edits.	275.00	2.40	660.00
	AKM	B120	A101	Email to Pat Lowe with Financial Horizon letter and case summary for review and approval.	275.00	0.10	27.50
	RAP	B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP	B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
10/17/2022	AKM	B120	A101	Email to Pat Lowe regarding mailed letter; updated tracking information.	275.00	0.10	27.50
10/18/2022	RAP	B180	A104	Review and signature of demand letter.	500.00	0.20	100.00
12/07/2022	AKM	B180	A101	Draft adversary complaint.	275.00	0.80	220.00
	RAP	B180	A104	Final review and signature of Original Complaint.	500.00	0.20	100.00
12/15/2022	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
12/19/2022	AKM	B180	A101	Attention to correspondence with Burkes.	275.00	0.20	55.00
12/30/2022	AKM	B180	A101	Review of email requesting extension.	275.00	0.10	27.50

Lowe, Pat

Statement No. 231991
Account No 1934.012
Page: 2

Claims against Financial Horizon Concepts LLC - F

				Rate	Hours	
	AKM	B180	A101	Voicemail requesting extension.	275.00	0.10 27.50
01/03/2023	AKM	B180	A101	Correspondence and telephone calls with Burkes regarding extending answer deadline.	275.00	0.30 82.50
01/04/2023	AKM	B180	A101	Prepare stipulation for answer extension; conduct related research regarding LLC.	275.00	0.30 82.50
01/05/2023	AKM	B180	A101	Confer with Randall A. Pulman regarding stipulation.	275.00	0.10 27.50
	AKM	B180	A101	Confer with Paul Burke regarding answer extension and updating stipulation.	275.00	0.40 110.00
	RAP	B180	A104	Confer with Anna MacFarlane regarding stipulation	500.00	0.10 50.00
01/06/2023	AKM	B180	A101	Emails with defendant and attention to stipulation issues.	275.00	1.50 412.50
01/10/2023	AKM	B180	A101	Confer via phone & email with defendant regarding stipulation.	275.00	0.30 82.50
	AKM	B180	A101	Review of signed stipulation.	275.00	0.10 27.50
01/11/2023	AKM	B180	A101	Final draft of stipulation extending time for answer and overseeing filing of same.	275.00	0.20 55.00
01/12/2023	AKM	B180	A101	Attention to corrected stipulation.	275.00	0.30 82.50
01/20/2023	AKM	B180	A101	Draft second stipulated extension and email defendant regarding same.	275.00	0.50 137.50
01/23/2023	AKM	B180	A101	Finalizing and filing second stipulated extension for answer deadline.	275.00	0.50 137.50
				For Legal Services Rendered		10.00 3,132.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.70	\$500.00	\$850.00
Anna K. MacFarlane	8.30	275.00	2,282.50

Lowe, Pat

Statement No. 231991

Account No 1934.012

Claims against Financial Horizon Concepts LLC - F

Page: 3

Advances

12/07/2022	B110	E124	Pay.gov - Filing fee for Adversary Complaint	350.00
			Total Advances	350.00
			Total Current Work	3,482.50
			Balance Due	<u>\$3,482.50</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	965.00	0.00
B180	Avoidance Action Analysis	2167.50	0.00
B100	Administration	3,132.50	350.00

Invoices are payable upon receipt.

EXHIBIT D-13

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231992
 Account No. 1934.013

Page: 1

Claims against Kenneth & Brownie Martin - Net Winners

Fees

				Rate	Hours	
10/14/2022	AKM B120	A101	Drafting demand to Martins (net winners).	275.00	0.70	192.50
	AKM B120	A101	Email to Pat Lowe with Martin demand and case summary for review and approval.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
	AKM B120	A104	Office conference with Randall A. Pulman regarding case summary.	275.00	0.20	55.00
10/17/2022	AKM B120	A101	Finalizing letter and oversee mailing of same.	275.00	0.20	55.00
	AKM B120	A101	Email to Pat Lowe regarding mailed letter; updated tracking information.	275.00	0.10	27.50
10/18/2022	RAP B180	A104	Review and signature of demand letter.	500.00	0.20	100.00
01/26/2023	AKM B180	A101	Draft notice of intent to seek default letter.	275.00	0.20	55.00
01/27/2023	AKM B180	A101	Finalize default notice letter for mailing.	275.00	0.10	27.50
			For Legal Services Rendered		2.30	790.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.70	\$500.00	\$350.00

Lowe, Pat
Statement No. 231992
Account No 1934.013
Claims against Kenneth & Brownie Martin - Net Wi
Page: 2

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	1.60	275.00	440.00

Total Current Work 790.00

Balance Due \$790.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	607.50	0.00
B180	Avoidance Action Analysis	182.50	0.00
B100	Administration	790.00	0.00

Invoices are payable upon receipt.

EXHIBIT D-14

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231993
 Account No. 1934.014

Page: 1

Claims against David & Mary Medlang - Net Winners

Fees

				Rate	Hours	
10/14/2022	AKM B120	A101	Drafting demand to Medlangs (net winners).	275.00	1.00	275.00
	AKM B120	A101	Email to Pat Lowe with Medlang demand and case summary for review and approval.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
	AKM B120	A104	Office conference with Randall A. Pulman regarding case summary.	275.00	0.20	55.00
10/17/2022	AKM B120	A101	Finalizing letters; oversee mailing of same.	275.00	0.50	137.50
	AKM B120	A101	Email to Pat Lowe regarding mailed letter; updated tracking information.	275.00	0.10	27.50
10/18/2022	RAP B180	A104	Review and signature of demand letter.	500.00	0.20	100.00
11/03/2022	AKM B120	A101	Review of email from Medlangs attorney.	275.00	0.10	27.50
11/04/2022	AKM B120	A101	Correspondence with Randall A. Pulman regarding Medlang attorney conversation.	275.00	0.30	82.50
	AKM B120	A101	Telephone call with opposing counsel.	275.00	0.30	82.50
	AKM B120	A101	Review of Medlang demand and voicemail to opposing counsel.	275.00	0.10	27.50
11/07/2022	AKM B120	A101	Review of email from Jason Kathman.	275.00	0.10	27.50

Lowe, Pat

Statement No. 231993

Account No 1934.014

Page: 2

Claims against David & Mary Medlang - Net Winne

				Rate	Hours	
	AKM B120	A101	Researching file and drafting response to Jason Kathman.	275.00	1.00	275.00
11/09/2022	AKM B120	A101	Confer with Randall A. Pulman regarding email from Jason Kathman.	275.00	0.20	55.00
	AKM B120	A101	Emails with Jason Kathman.	275.00	0.30	82.50
	RAP B120	A104	Confer with Anna MacFarlane regarding email from Jason Kathman.	500.00	0.20	100.00
11/29/2022	AKM B120	A101	Email correspondence with opposing counsel.	275.00	0.20	55.00
12/01/2022	AKM B120	A101	Email to opposing counsel.	275.00	0.10	27.50
12/12/2022	AKM B180	A101	VM from Jason Kathman.	275.00	0.10	27.50
12/13/2022	AKM B180	A101	Correspondence regarding settlement.	275.00	0.50	137.50
	AKM B180	A101	Confer with Randall A. Pulman regarding settlement.	275.00	0.20	55.00
	AKM B180	A101	Brief research regarding good faith defense.	275.00	0.30	82.50
	AKM B180	A101	Confer with Randall A. Pulman regarding good faith defense.	275.00	0.10	27.50
	RAP B180	A104	Confer with Anna MacFarlane regarding settlement and good faith defense.	500.00	0.30	150.00
12/14/2022	AKM B180	A101	Research good faith defense.	275.00	1.10	302.50
	AKM B180	A101	Confer with opposing counsel via phone and email.	275.00	0.50	137.50
12/15/2022	AKM B180	A101	Attention to settlement discussions.	275.00	1.00	275.00
	RAP B180	A104	Office conference with A. MacFarlane regarding settlement offers.	500.00	0.30	150.00
12/16/2022	AKM B180	A101	Confer with Randall A. Pulman regarding settlement discussions.	275.00	0.30	82.50
	AKM B180	A101	Correspondence to opposing counsel regarding settlement.	275.00	0.30	82.50
	RAP B180	A104	Office conference with A. MacFarlane regarding settlement offers; telephone conference with P. Lowe regarding offer from Defendants.	500.00	0.20	100.00

Lowe, Pat

Statement No. 231993

Account No 1934.014

Claims against David & Mary Medlang - Net Winne

Page: 3

					Rate	Hours	
01/04/2023	AKM B180	A101	Emails with opposing counsel regarding settlement.		275.00	0.50	137.50
01/05/2023	AKM B180	A101	Confer with Randall A. Pulman regarding settlement.		275.00	0.10	27.50
	AKM B180	A101	Email to Opposing counsel regarding settlement.		275.00	0.10	27.50
	AKM B180	A101	Draft settlement agreement and circulate to Randall A. Pulman for review.		275.00	0.80	220.00
	AKM B180	A101	Circulate draft settlement agreement to opposing counsel for review.		275.00	0.10	27.50
	RAP B180	A108	Review and approval settlement agreement; office conference with A. MacFarlane regarding same.		500.00	0.30	150.00
01/06/2023	AKM B180	A101	Review of stipulation and proposed order; emails regarding same.		275.00	0.50	137.50
01/12/2023	AKM B180	A101	Continue drafting settlement agreement per opposing counsel comments and edits.		275.00	0.90	247.50
	AKM B180	A101	Confer with Randall A. Pulman regarding settlement agreement changes.		275.00	0.10	27.50
	RAP B180	A104	Review of comments to settlement agreement; office conference with A. MacFarlane regarding same.		500.00	0.50	250.00
01/13/2023	AKM B180	A101	Confer with Randall A. Pulman regarding settlement agreement revisions.		275.00	0.20	55.00
	AKM B180	A101	Confer with opposing counsel regarding additional extension and further revisions to settlement agreement.		275.00	0.20	55.00
	RAP B180	A108	Review of edits to settlement agreement; office conference with A. MacFarlane regarding same.		500.00	0.50	250.00
01/17/2023	AKM B180	A101	Prepare draft of 9019 Motion.		275.00	1.70	467.50
01/19/2023	AKM B180	A101	Emails with opposing counsel regarding settlement agreement approval.		275.00	0.20	55.00
	AKM B180	A101	Continue drafting 9019 Motion.		275.00	0.40	110.00

Lowe, Pat

Statement No. 231993

Account No 1934.014

Page: 4

Claims against David & Mary Medlang - Net Winne

					Rate	Hours	
01/20/2023	AKM	B180	A101	Emails with opposing counsel regarding settlement.	275.00	0.50	137.50
	AKM	B180	A101	Continue drafting 9019 Motion.	275.00	0.80	220.00
	RAP	B180	A108	Review of correspondence regarding settlement; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
01/21/2023	AKM	B180	A101	Emails with Pat Lowe regarding executed settlement agreement.	275.00	0.20	55.00
01/23/2023	AKM	B180	A101	Emails with Pat Lowe and opposing counsel regarding settlement.	275.00	0.30	82.50
	AKM	B180	A101	Emails with Pat Lowe regarding settlement.	275.00	0.30	82.50
01/24/2023	AKM	B180	A101	Review of email from opposing counsel requesting letter with wire instructions.	275.00	0.10	27.50
	AKM	B180	A101	Drafting and sending letter with wire instructions; confer with Randall A. Pulman regarding same.	275.00	0.50	137.50
	AKM	B180	A101	Continue drafting 9019 motion per Randall A. Pulman comments and edits.	275.00	0.50	137.50
	AKM	B180	A101	Call with Medlang's financial advisor regarding wire transfer.	275.00	0.10	27.50
	AKM	B180	A101	Email to Pat Lowe and team regarding call with financial advisor.	275.00	0.10	27.50
01/25/2023	AKM	B180	A101	Emails regarding wire transfer update.	275.00	0.20	55.00
01/30/2023	RAP	B180	A104	Review of 9019 Motion for filing.	500.00	0.20	100.00
	AKM	B180	A101	Review of scheduling order.	275.00	0.10	27.50
	AKM	B180	A101	Review of email from Randall A. Pulman to opposing counsel regarding settlement agreement.	275.00	0.10	27.50
	AKM	B180	A101	Final drafting and review of 9019 Motion with Medlang's per Randall A. Pulman comments and edits.	275.00	1.20	330.00
	AKM	B180	A101	Email to opposing counsel regarding 9019 Motion (Medlang's).	275.00	0.10	27.50
				For Legal Services Rendered		23.40	7,222.50

Lowe, Pat

Statement No. 231993

Account No 1934.014

Claims against David & Mary Medlang - Net Winne

Page: 5

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	3.50	\$500.00	\$1,750.00
Anna K. MacFarlane	19.90	275.00	5,472.50

Advances

01/31/2023	B110	E108	Postage - Mailout of 9019 regarding Settlement - Blend Document Technologies #56956B	2,079.68
			Total Advances	2,079.68
			Total Current Work	9,302.18
			Balance Due	<u>\$9,302.18</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	2079.68
B120	Asset Analysis and Recovery	1615.00	0.00
B180	Avoidance Action Analysis	5607.50	0.00
B100	Administration	7,222.50	2,079.68

Invoices are payable upon receipt.

EXHIBIT D-15

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231994
 Account No. 1934.015

Page: 1

Claims against Financial Partners of America LLC - Finder

Fees

				Rate	Hours	
10/17/2022	AKM B120	A101	Draft demand letter and case summary to Financial Partners of America et al.	275.00	1.10	302.50
	AKM B120	A101	Send draft case summary and demand letter to Pat Lowe for review and approval (Financial Partners).	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
10/18/2022	RAP B180	A104	Review and signature of demand letter.	500.00	0.20	100.00
	AKM B120	A101	Finalizing demand letter to Financial Partners of America for mailing.	275.00	0.30	82.50
	AKM B120	A101	Correspondence with Pat Lowe regarding demand letter and case summary.	275.00	0.10	27.50
11/10/2022	AKM B120	A101	Review of returned mail, confer with Randall A. Pulman regarding same.	275.00	0.20	55.00
11/14/2022	AKM B120	A101	Call with attorney regarding Jonmark Richardson.	275.00	0.10	27.50
	AKM B120	A101	Confer with Randall A. Pulman regarding attorney phone call.	275.00	0.10	27.50
	RAP B120	A101	Confer with Anna McFarlane regarding call with Jonmark Richardson.	500.00	0.10	50.00
11/15/2022	AKM B120	A101	Email to opposing counsel requesting information.	275.00	0.20	55.00

Lowe, Pat

Statement No. 231994

Account No 1934.015

Page: 2

Claims against Financial Partners of America LLC -

					Rate	Hours	
12/06/2022	AKM	B120	A101	Telephone call with opposing counsel regarding information request.	275.00	0.10	27.50
12/07/2022	AKM	B180	A101	Brief review of documents from opposing counsel.	275.00	0.50	137.50
12/08/2022	AKM	B180	A101	Confer with Randall A. Pulman regarding Jonmark Richardson financials.	275.00	0.10	27.50
	AKM	B180	A101	Email to Pat Lowe regarding Jonmark Richardson.	275.00	0.20	55.00
	RAP	B180	A104	Confer with Anna MacFarlane regarding Jonmark Richardson financials.	500.00	0.10	50.00
12/20/2022	GM	B180	A101	Prepare adversary complaint along with exhibits.	100.00	4.00	400.00
12/21/2022	AKM	B180	A101	Review of adversary proceeding complaint.	275.00	0.50	137.50
12/22/2022	AKM	B180	A101	Review of adversary complaint.	275.00	0.50	137.50
01/04/2023	AKM	B180	A101	Confer with Randall A. Pulman regarding settlement discussions.	275.00	0.20	55.00
	RAP	B180	A104	Confer w Anna MacFarlane regarding settlement discussions.	500.00	0.20	100.00
01/13/2023	AKM	B180	A101	Continue drafting adversary proceeding complaint.	275.00	0.30	82.50
01/16/2023	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.30	82.50
01/19/2023	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/30/2023	AKM	B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.50	137.50
	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
01/31/2023	AKM	B180	A101	Continue drafting adversary proceeding			

Lowe, Pat

Statement No. 231994

Account No 1934.015

Page: 3

Claims against Financial Partners of America LLC -

				Rate	Hours	
			complaint per Randall A. Pulman and			
			Leslie S. Hyman comments and edits.	275.00	0.30	82.50
AKM	B180	A101	Final review of adversary proceeding			
			complaint for filing.	275.00	0.20	55.00
RAP	B180	A101	Review and signature of summons.	500.00	0.20	100.00
			For Legal Services Rendered		11.70	2,877.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.60	\$500.00	\$800.00
Anna K. MacFarlane	6.10	275.00	1,677.50
Gaurav Mankotia	4.00	100.00	400.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	25.92
			Total Advances	375.92

Total Current Work 3,253.42

Balance Due \$3,253.42

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	375.92
B120	Asset Analysis and Recovery	932.50	0.00
B180	Avoidance Action Analysis	1945.00	0.00
B100	Administration	2,877.50	375.92

Invoices are payable upon receipt.

EXHIBIT D-16

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231995
 Account No. 1934.016

Page: 1

Claims against INF Solutions LLC - Finder

Fees

				Rate	Hours	
10/17/2022	AKM B120	A101	Draft demand letter and case summary to INF Solutions, LLC et al.	275.00	0.80	220.00
	AKM B120	A101	Send draft case summary and demand letter to Pat Lowe for review and approval (INF Solutions).	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
10/18/2022	RAP B180	A104	Review and signature of demand letter.	500.00	0.20	100.00
	AKM B120	A101	Finalizing demand letter to INF Solutions for mailing.	275.00	0.30	82.50
	AKM B120	A101	Correspondence with Pat Lowe regarding demand letter and case summary.	275.00	0.10	27.50
10/25/2022	AKM B120	A101	Phone call with Raphael Vallier.	275.00	0.40	110.00
	AKM B120	A101	Confer with Randall A. Pulman regarding Raphael Vallier phone call.	275.00	0.30	82.50
	RAP B120	A101	Confer with Anna MacFarlane regarding Raphael Vallier phone call.	500.00	0.30	150.00
12/07/2022	AKM B180	A101	Draft adversary complaint.	275.00	0.80	220.00
	RAP B180	A104	Final review and signature of Original Complaint.	500.00	0.20	100.00
12/15/2022	RAP B180	A101	Review and signature of summons.	500.00	0.20	100.00

Lowe, Pat

Statement No. 231995

Account No 1934.016

Page: 2

Claims against INF Solutions LLC - Finder

				Rate	Hours	
01/10/2023	AKM B180	A101	Review of scheduling order issued by court.	275.00	0.20	55.00
01/18/2023	AKM B180	A101	Begin drafting Rule 26(a) initial disclosures.	275.00	0.70	192.50
01/19/2023	AKM B180	A101	Continue drafting Rule 26(a) disclosures.	275.00	1.30	357.50
01/24/2023	AKM B180	A101	Finalizing disclosures per Randall A. Pulman comments and edits.	275.00	1.30	357.50
	AKM B180	A101	Serving disclosures via email to opposing counsel.	275.00	0.20	55.00
	RAP B180	A104	Review and edit of disclosures; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
01/25/2023	AKM B180	A101	Attention to scheduling order deadlines and issues.	275.00	0.30	82.50
01/30/2023	AKM B180	A101	Review and approval of statement regarding consent.	275.00	0.10	27.50
			For Legal Services Rendered		8.60	2,747.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.70	\$500.00	\$850.00
Anna K. MacFarlane	6.90	275.00	1,897.50

Advances

12/07/2022	B110	E124	Pay.gov - Filing fee for Adversary Complaint	350.00
			Total Advances	350.00

Total Current Work 3,097.50

Balance Due \$3,097.50

Lowe, Pat

Statement No. 231995

Account No 1934.016

Page: 3

Claims against INF Solutions LLC - Finder

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	950.00	0.00
B180	Avoidance Action Analysis	1797.50	0.00
B100	Administration	2,747.50	350.00

Invoices are payable upon receipt.

EXHIBIT D-17

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231996
 Account No. 1934.017

Page: 1

Claims against GM Consultants Group Inc - Finder

Fees

				Rate	Hours	
10/17/2022	AKM B120	A101	Draft demand letter and case summary to GM Consultants Group Inc.	275.00	0.60	165.00
	AKM B120	A101	Send draft case summary and demand letter to Pat Lowe for review and approval (GM Consultants).	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
10/18/2022	RAP B180	A104	Review and signature of demand letter.	500.00	0.20	100.00
	AKM B120	A101	Finalizing demand letter to GM Consultants Group for mailing.	275.00	0.30	82.50
	AKM B120	A101	Correspondence with Pat Lowe regarding demand letter and case summary.	275.00	0.10	27.50
10/20/2022	RAP B180	A104	Review and signature of demand letter.	500.00	0.20	100.00
10/31/2022	AKM B120	A101	Research address after letter returned; confer with Randall A. Pulman regarding same.	275.00	0.30	82.50
12/20/2022	AKM B180	A101	Confer with Gaurav Mankotia regarding complaint and exhibits.	275.00	0.20	55.00
	GM B180	A101	Prepare adversary complaint along with exhibits.	100.00	4.00	400.00
	RAP B180	A107	Review of draft of Original Complaint.	500.00	0.20	100.00

Lowe, Pat

Statement No. 231996

Account No 1934.017

Page: 2

Claims against GM Consultants Group Inc - Finder

					Rate	Hours	
12/21/2022	AKM	B180	A101	Review of adversary proceeding complaint; creating exhibits.	275.00	1.10	302.50
01/31/2023	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
	AKM	B180	A101	Continue drafting adversary proceeding complaint per Randall A. Pulman and Leslie S. Hyman comments and edits.	275.00	0.70	192.50
	AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.10	27.50
				For Legal Services Rendered		8.90	2,062.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.40	\$500.00	\$700.00
Anna K. MacFarlane	3.50	275.00	962.50
Gaurav Mankotia	4.00	100.00	400.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	33.88
			Total Advances	383.88

Total Current Work 2,446.38

Balance Due \$2,446.38

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	383.88
B120	Asset Analysis and Recovery	635.00	0.00
B180	Avoidance Action Analysis	1427.50	0.00
B100	Administration	2,062.50	383.88

Invoices are payable upon receipt.

EXHIBIT D-18

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231997
 Account No. 1934.018

Page: 1

Claims against Candice Gillen - Net Winner

Fees

				Rate	Hours	
10/18/2022	AKM B120	A101	Draft demand letter and case summary for Candice Gillen.	275.00	0.70	192.50
	AKM B120	A101	Finalizing letter to Gillen for signature and mailing.	275.00	0.20	55.00
	AKM B120	A101	Email to Pat Lowe with case summary and draft demand for review and approval.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
10/20/2022	RAP B180	A104	Review and signature of demand letter.	500.00	0.20	100.00
01/12/2023	AKM B180	A101	Phone calls with Gillen, her son, and financial advisor.	275.00	0.50	137.50
01/26/2023	AKM B180	A101	Draft default notice letter.	275.00	0.20	55.00
01/27/2023	AKM B180	A101	Finalize default notice letter for mailing.	275.00	0.30	82.50
			For Legal Services Rendered		2.70	900.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.70	\$500.00	\$350.00
Anna K. MacFarlane	2.00	275.00	550.00

Lowe, Pat

Statement No. 231997

Account No 1934.018

Claims against Candice Gillen - Net Winner

Page: 2

Total Current Work 900.00

Balance Due \$900.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	525.00	0.00
B180	Avoidance Action Analysis	375.00	0.00
B100	Administration	900.00	0.00

Invoices are payable upon receipt.

EXHIBIT D-19

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231998
 Account No. 1934.019

Page: 1

Claims against Alice Snell - Net Winner

Fees

				Rate	Hours	
10/18/2022	AKM B120	A101	Draft demand letter and case summary for Alice Snell.	275.00	0.40	110.00
	AKM B120	A101	Finalizing letter to Snell for signature and mailing.	275.00	0.20	55.00
	AKM B120	A101	Email to Pat Lowe with case summary and draft demand for review and approval.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
10/20/2022	RAP B180	A104	Review and signature of demand letter.	500.00	0.20	100.00
01/11/2023	AKM B180	A101	Review of emails regarding check from Alice Snell.	275.00	0.30	82.50
	AKM B180	A101	Confer with Randall A. Pulman regarding check.	275.00	0.20	55.00
	RAP B180	A108	Review of e-mail regarding payment by Snell to District Clerk; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
01/12/2023	AKM B180	A101	Attention to emails regarding check.	275.00	0.30	82.50
01/27/2023	AKM B180	A101	Prepare draft of letter to Alice Snell regarding re-issuing check previously made payable to bankruptcy court.	275.00	0.70	192.50
	AKM B180	A101	Emails with Randall A. Pulman regarding			

Lowe, Pat

Statement No. 231998

Account No 1934.019

Page: 2

Claims against Alice Snell - Net Winner

	Rate	Hours	
letter.	275.00	0.20	55.00
For Legal Services Rendered		3.40	1,160.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	2.40	275.00	660.00

Total Current Work	1,160.00
--------------------	----------

Balance Due	<u>\$1,160.00</u>
--------------------	--------------------------

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	442.50	0.00
B180	Avoidance Action Analysis	717.50	0.00
B100	Administration	1,160.00	0.00

Invoices are payable upon receipt.

EXHIBIT D-20

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 231999
 Account No. 1934.020

Page: 1

Claims against Carl & Paula Jarnecke/Trust - Net Winners

Fees

				Rate	Hours		
10/18/2022	AKM	B120	A101	Draft demand letter and case summary for Jarneckes.	275.00	0.50	137.50
	AKM	B120	A101	Finalizing letter to Jarneckes for signature and mailing.	275.00	0.20	55.00
	AKM	B120	A101	Email to Pat Lowe with case summary and draft demand for review and approval.	275.00	0.10	27.50
	RAP	B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP	B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
10/20/2022	RAP	B180	A104	Review and signature of demand letter.	500.00	0.20	100.00
01/13/2023	AKM	B180	A101	Attention to email correspondence regarding Jarneckes' check.	275.00	0.30	82.50
01/17/2023	RAP	B180	A104	Receipt of check for approximately \$35,000 from Trustee.	500.00	0.20	100.00
01/27/2023	AKM	B180	A101	Prepare draft of letter to Jarneckes regarding re-issuing check previously made payable to bankruptcy court.	275.00	0.50	137.50
				For Legal Services Rendered		2.50	890.00

Lowe, Pat

Statement No. 231999

Account No 1934.020

Page: 2

Claims against Carl & Paula Jarnecke/Trust - Net W

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.90	\$500.00	\$450.00
Anna K. MacFarlane	1.60	275.00	440.00

Total Current Work	890.00
--------------------	--------

Balance Due	<u>\$890.00</u>
--------------------	------------------------

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	470.00	0.00
B180	Avoidance Action Analysis	420.00	0.00
B100	Administration	890.00	0.00

Invoices are payable upon receipt.

EXHIBIT D-21

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232000
 Account No. 1934.021

Page: 1

Claims against D. Stein/Fidelity Mutual - Finder

Fees

				Rate	Hours	
10/17/2022	AKM B120	A101	Begin drafting demand letter and case summary to Darryl Stein / Fidelity Mutual.	275.00	0.20	55.00
10/19/2022	AKM B120	A101	Draft demand and case summary for Darryl Stein / Fidelity Mutual and conduct related research.	275.00	1.90	522.50
	AKM B120	A101	Email with draft case summary and demand to Pat Lowe for review and approval.	275.00	0.20	55.00
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
10/20/2022	RAP B180	A104	Review and signature of demand letter.	500.00	0.20	100.00
	AKM B120	A101	Email to Pat Lowe regarding demand to Darryl Stein mailed on 10/19/2022.	275.00	0.10	27.50
10/25/2022	AKM B120	A101	Telephone call with Darryl Stein / Fidelity Mutual (recipient of finder letter).	275.00	0.20	55.00
	AKM B120	A101	Confer with Randall A. Pulman regarding Darryl Stein phone call and email.	275.00	0.30	82.50
	AKM B120	A101	Telephone call with Michael Andrus (recipient of Fidelity finder letter).	275.00	0.40	110.00
10/26/2022	AKM B120	A101	Correspondence with Darryl Stein.	275.00	0.50	137.50

Lowe, Pat

Statement No. 232000

Account No 1934.021

Page: 2

Claims against D. Stein/Fidelity Mutual - Finder

					Rate	Hours	
11/02/2022	AKM	B120	A101	Emails with Jordan Rappaport (Darryl Stein attorney).	275.00	0.20	55.00
11/14/2022	AKM	B120	A101	Call with attorney Jordan Rappaport (0.3); confer with Randall A. Pulman regarding same (0.1).	275.00	0.40	110.00
12/22/2022	GM	B180	A101	Prepare adversary complaint along with annexures.	100.00	4.00	400.00
01/03/2023	AKM	B180	A101	Begin review of adversary complaint.	275.00	0.40	110.00
01/04/2023	AKM	B180	A101	Continue reviewing adversary complaint.	275.00	0.70	192.50
01/05/2023	GM	B180	A101	Confer with Anna regarding adversary complaint; review and edit adversary complaint after comments.	100.00	0.20	20.00
01/30/2023	AKM	B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.60	165.00
01/31/2023	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
	AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
				For Legal Services Rendered		11.50	2,652.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	6.30	275.00	1,732.50
Gaurav Mankotia	4.20	100.00	420.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	26.40
			Total Advances	376.40

Lowe, Pat

Statement No. 232000

Account No 1934.021

Claims against D. Stein/Fidelity Mutual - Finder

Page: 3

Total Current Work 3,028.90

Balance Due \$3,028.90

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	376.40
B120	Asset Analysis and Recovery	1460.00	0.00
B180	Avoidance Action Analysis	1192.50	0.00
B100	Administration	2,652.50	376.40

Invoices are payable upon receipt.

EXHIBIT D-22

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232001
 Account No. 1934.022

Page: 1

Claims against McNamara Cap. Investmt Grp - Finder

Fees

				Rate	Hours	
10/18/2022	AKM B120	A101	Draft demand and case summary for McNamara Capital and conduct research regarding same.	275.00	0.80	220.00
10/19/2022	AKM B120	A101	Continue drafting McNamara demand and case summary.	275.00	0.20	55.00
	AKM B120	A101	Email with draft case summary and demand to Pat Lowe for review and approval.	275.00	0.20	55.00
	AKM B120	A101	Finalize draft demand for signature and mailing.	275.00	0.20	55.00
	AKM B120	A101	Finalize draft demand for signature and mailing.	275.00	0.20	55.00
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
10/20/2022	RAP B180	A104	Review and signature of demand letter.	500.00	0.20	100.00
	AKM B120	A101	Email to Pat Lowe regarding demand to McNamara Capital mailed on 10/19/2022.	275.00	0.10	27.50
11/10/2022	AKM B120	A101	Correspondence (phone and e-mail) with David Rivelli (attorney) regarding John McNamara.	275.00	0.40	110.00
	AKM B120	A101	Confer with Randall A. Pulman regarding David Rivelli correspondence.	275.00	0.10	27.50
	RAP B120	A101	Confer with Anna MacFarlane regarding			

Lowe, Pat

Statement No. 232001

Account No 1934.022

Page: 2

Claims against McNamara Cap. Investmt Grp - Find

					Rate	Hours	
				David Rivelli correspondence.	500.00	0.10	50.00
11/11/2022	RAP	B120	A107	Office conference with A. MacFarlane regarding discussions with Defendant's counsel.	500.00	0.20	100.00
11/30/2022	AKM	B180	A101	Drafting adversary complaint against McNamara Capital and J. McNamara.	275.00	0.60	165.00
12/01/2022	AKM	B180	A101	Continue drafting complaint against McNamara; continue research regarding same; organizing exhibits.	275.00	1.50	412.50
12/05/2022	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits; send to Pat Lowe for review.	275.00	0.80	220.00
12/06/2022	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.60	165.00
12/07/2022	AKM	B180	A101	Continue drafting adversary complaint per RAP comments and edits.	275.00	0.40	110.00
	RAP	B180	A104	Final review and signature of Original Complaint.	500.00	0.20	100.00
12/15/2022	RAP	B180	A101	Review and signature of summons.	500.00	0.20	100.00
01/09/2023	AKM	B180	A101	Phone call with McNamara counsel (not in bankruptcy).	275.00	0.10	27.50
01/26/2023	AKM	B180	A101	Drafting default notice letter.	275.00	0.80	220.00
01/27/2023	AKM	B180	A101	Finalize default notice letter for mailing.	275.00	0.10	27.50
				For Legal Services Rendered		8.50	2,652.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.40	\$500.00	\$700.00
Anna K. MacFarlane	7.10	275.00	1,952.50

Lowe, Pat

Statement No. 232001

Account No 1934.022

Claims against McNamara Cap. Investmt Grp - Find

Page: 3

Advances

12/07/2022	B110	E124	Pay.gov - Filing fee for Adversary Complaint	350.00
			Total Advances	350.00
			Total Current Work	3,002.50
			Balance Due	\$3,002.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	1005.00	0.00
B180	Avoidance Action Analysis	1647.50	0.00
B100	Administration	2,652.50	350.00

Invoices are payable upon receipt.

EXHIBIT D-23

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232002
 Account No. 1934.023

Page: 1

Claims against PGH Advisors - Finder

Fees

				Rate	Hours	
10/19/2022	AKM B120	A101	Draft demand and case summary for PGH Advisors et al.	275.00	1.30	357.50
	AKM B120	A101	Email with draft case summary and demand to Pat Lowe for review and approval.	275.00	0.20	55.00
	AKM B120	A101	Finalize draft demand for signature and mailing.	275.00	0.30	82.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
10/20/2022	RAP B180	A104	Review and signature of demand letter.	500.00	0.20	100.00
	AKM B120	A101	Email to Pat Lowe regarding demand to PGH Advisors mailed on 10/19/2022.	275.00	0.10	27.50
11/07/2022	AKM B180	A101	Telephone call with AZ law firm representing multiple finders (0.1); confer with Randall A. Pulman regarding same (0.1).	275.00	0.20	55.00
11/14/2022	AKM B120	A101	Call with attorney regarding Hopman, PGH, MP Wealth.	275.00	0.20	55.00
	AKM B120	A101	Confer with Randall A. Pulman regarding Finder's attorney phone call.	275.00	0.10	27.50
	RAP B120	A101	Confer with Anna MacFarlane regarding Finder's attorney phone conversation.	500.00	0.10	50.00

Lowe, Pat

Statement No. 232002

Account No 1934.023

Page: 2

Claims against PGH Advisors - Finder

					Rate	Hours	
11/15/2022	AKM B120	A101	Email to opposing counsel requesting information.		275.00	0.20	55.00
11/29/2022	AKM B120	A101	Emails with opposing counsel (0.2) regarding settlement; confer with Randall A. Pulman regarding same.		275.00	0.50	137.50
11/30/2022	AKM B180	A101	Email correspondence with opposing counsel regarding PGH statute of repose issues.		275.00	0.30	82.50
	AKM B180	A101	Drafting complaint against Hopman, PGH, MP Wealth Management, Hopman Group, and MaRico Tippet; conduct relevant file and legal research.		275.00	5.70	1,567.50
12/01/2022	AKM B180	A101	Continue drafting complaint against PGH; continue research regarding same; organizing exhibits.		275.00	1.50	412.50
12/05/2022	AKM B180	A101	Continue drafting complaint per Randall A. Pulman comments and edits; send to Pat Lowe for review.		275.00	0.70	192.50
12/06/2022	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.		275.00	1.60	440.00
	AKM B180	A101	Confer with opposing counsel regarding complaint.		275.00	0.10	27.50
12/07/2022	AKM B180	A101	Continue drafting adversary complaint per RAP comments and edits.		275.00	0.40	110.00
	RAP B180	A104	Final review and signature of Original Complaint.		500.00	0.20	100.00
12/08/2022	AKM B180	A101	Telephone call with opposing counsel regarding case.		275.00	0.10	27.50
12/16/2022	AKM B180	A101	Telephone call with opposing counsel regarding answer.		275.00	0.10	27.50
01/04/2023	AKM B180	A101	Emails with PGH counsel regarding extension.		275.00	0.40	110.00

Lowe, Pat

Statement No. 232002

Account No 1934.023

Page: 3

Claims against PGH Advisors - Finder

				Rate	Hours	
01/05/2023	AKM B180	A101	Correspondence with opposing counsel regarding extending answer deadline and review and approval of motion regarding same.	275.00	0.60	165.00
	AKM B180	A101	Correspondence with opposing counsel for MaRico Tippet and Randall A. Pulman regarding extending answer deadline.	275.00	0.40	110.00
01/06/2023	AKM B180	A101	Emails with opposing counsel for Tippet and drafting stipulation for extension of answer date.	275.00	1.50	412.50
01/09/2023	AKM B180	A101	Phone call with Tippet attorney.	275.00	0.50	137.50
01/10/2023	AKM B180	A101	Analysis of Tippet settlement offer; confer with Randall A. Pulman regarding same.	275.00	0.40	110.00
	AKM B180	A101	Correspondence with opposing counsel for Tippet regarding settlement.	275.00	0.40	110.00
	RAP B180	A101	Confer with Anna McFarlane regarding Trippett settlement offer.	500.00	0.20	100.00
01/11/2023	AKM B180	A101	Amending complaint to include CWB Investments transfers.	275.00	1.10	302.50
01/12/2023	AKM B180	A101	Emails with Randall A. Pulman regarding Hopman case.	275.00	0.20	55.00
	AKM B180	A101	Phone call with Randall A. Pulman and Boliver regarding Hopman case.	275.00	0.50	137.50
	RAP B180	A101	Phone call with Boliver regarding Hopman case.	500.00	0.50	250.00
01/17/2023	AKM B180	A101	Emails with Tippet attorney regarding documents.	275.00	0.30	82.50
01/18/2023	AKM B180	A101	Review of documents sent by Tippet attorney and additional background research post-call.	275.00	0.70	192.50
	AKM B180	A101	Call with Tippet attorney.	275.00	0.30	82.50
01/19/2023	AKM B180	A101	Prepare second stipulation extending			

Lowe, Pat

Statement No. 232002

Account No 1934.023

Claims against PGH Advisors - Finder

Page: 4

					Rate	Hours	
				answer deadline; emails with opposing counsel regarding same.	275.00	0.60	165.00
01/20/2023	AKM	B180	A101	Initial review of motion to dismiss.	275.00	0.10	27.50
01/23/2023	AKM	B180	A101	Emails regarding motion to dismiss hearing and review of Tippet joinder.	275.00	0.30	82.50
	RAP	B180	A101	Conference call with Anna MacFarlane and Boliver regarding Hopman case.	500.00	0.50	250.00
01/24/2023	AKM	B180	A101	Confer with Randall A. Pulman regarding amending PGH Complaint and Motion to dismiss.	275.00	0.40	110.00
	AKM	B180	A101	In-office conference with Randall A. Pulman and Leslie S. Hyman regarding amending complaint.	275.00	0.40	110.00
	AKM	B180	A101	Calculating deadline to file amended complaint without leave.	275.00	0.20	55.00
	AKM	B180	A101	Review of Arizona Corporation Commission order.	275.00	0.60	165.00
	AKM	B180	A101	Review of motion to dismiss.	275.00	0.70	192.50
	RAP	B180	A104	Review of Motion to Dismiss; review of Arizona Securities Commission consent judgment for Hoppman.	500.00	1.00	500.00
	RAP	B180	A104	Review of 12(b)(6) Motion; review of Arizona Securities Commission Agreed Judgment; office conference with L. Hyman and A. MacFarlane regarding amending pleading and responses to 12(b)(6) Motion.	500.00	1.00	500.00
	LSH	B120	A105	Communicate (in firm) with R. Pulman and A. MacFarlane regarding motion to dismiss.	450.00	0.20	90.00
	LSH	B120	A104	Review/analyze motion to dismiss.	450.00	1.50	675.00
01/25/2023	AKM	B180	A101	Confer with Randall A. Pulman and Leslie S. Hyman regarding Hopman case.	275.00	0.30	82.50
	AKM	B180	A101	Emails with opposing counsel regarding scheduling call.	275.00	0.40	110.00
	RAP	B180	A104	Office conference with L. Hyman and A. MacFarlane regarding Arizona Securities Commission order and restitution of			

Lowe, Pat

Statement No. 232002

Account No 1934.023

Page: 5

Claims against PGH Advisors - Finder

					Rate	Hours	
				commissions.	500.00	0.50	250.00
	LSH	B120	A105	Communicate (in firm) with R. Pulman and A. MacFarlane regarding issues raised in motion to dismiss.	450.00	0.30	135.00
	LSH	B120	A103	Draft/revise First Amended complaint.	450.00	1.60	720.00
01/26/2023	AKM	B180	A101	Conduct legal research regarding reasonably equivalent value; confer with Randall A. Pulman and Leslie S. Hyman regarding same.	275.00	3.50	962.50
	AKM	B180	A101	Phone call with Randall A. Pulman, Leslie S. Hyman, and opposing counsel.	275.00	0.20	55.00
	AKM	B180	A101	In-office conference regarding complaint.	275.00	0.30	82.50
	AKM	B180	A101	Phone call with Randall A. Pulman regarding amending complaint.	275.00	0.10	27.50
	RAP	B180	A104	Office conference with A. MacFarlane and L. Hyman regarding Motion to Dismiss and Arizona Securities Department restitution order; telephone conference with opposing counsel regarding same.	500.00	1.00	500.00
	LSH	B120	A105	Communicate (in firm) with R. Pulman and A. MacFarlane regarding issues raised in motion to dismiss.	450.00	0.60	270.00
	LSH	B120	A105	Communicate (in firm) with A. MacFarlane regarding legal issues raised in motion to dismiss.	450.00	0.40	180.00
01/27/2023	LSH	B120	A102	Legal research regarding motion to dismiss arguments including elements of fraudulent transfer claims.	450.00	1.30	585.00
	LSH	B120	A103	Continue drafting first amended complaint.	450.00	0.70	315.00
01/30/2023	AKM	B180	A101	Review of Leslie S. Hyman edits and comments to First Amended Complaint; in-office conference with Leslie S. Hyman and Randall A. Pulman regarding same.	275.00	0.70	192.50
	AKM	B180	A101	Confer with Randall A. Pulman regarding Tippet settlement offer.	275.00	0.10	27.50
	AKM	B180	A101	Emails with opposing counsel regarding Tippet settlement offer and counteroffer.	275.00	0.20	55.00

Lowe, Pat

Statement No. 232002

Account No 1934.023

Page: 6

Claims against PGH Advisors - Finder

				Rate	Hours	
RAP	B180	A104	Office conference with L. Hyman and A. MacFarlane regarding demand on Arizona Securities Commission.	500.00	0.20	100.00
LSH	B120	A103	Continue drafting first amended complaint.	450.00	1.00	450.00
LSH	B120	A105	Communicate (in firm) with A. MacFarlane regarding issues raised in motion to dismiss.	450.00	0.50	225.00
LSH	B120	A105	Communicate (in firm) with R. Pulman and A. MacFarlane regarding issues raised in motion to dismiss.	450.00	0.10	45.00
LSH	B120	A102	Research regarding issues raised in motion to dismiss.	450.00	0.40	180.00

01/31/2023	AKM	B180	A101	Emails with Brian Laird regarding settlement - Tippet.	275.00	0.40	110.00
				For Legal Services Rendered		44.90	15,180.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	5.90	\$500.00	\$2,950.00
Anna K. MacFarlane	30.40	275.00	8,360.00
Leslie Hyman	8.60	450.00	3,870.00

Advances

12/07/2022	B110	E124	Other Pay.gov - Filing fee for Adversary Complaint	350.00
			Total Advances	350.00

Total Current Work 15,530.00

Balance Due \$15,530.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	4967.50	0.00
B180	Avoidance Action Analysis	10212.50	0.00
B100	Administration	15,180.00	350.00

Lowe, Pat

Statement No. 232002

Account No 1934.023

Claims against PGH Advisors - Finder

Page: 7

Invoices are payable upon receipt.

EXHIBIT D-24

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232003
 Account No. 1934.024

Page: 1

Claims against Jacob Proux - Finder

Fees

					Rate	Hours	
10/19/2022	AKM	B120	A101	Draft demand and case summary for Jacob Proulx (Finder).	275.00	0.30	82.50
10/20/2022	AKM	B120	A101	Continue drafting demand and case summary for Jacob Proulx.	275.00	0.20	55.00
	AKM	B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	AKM	B120	A101	Email to Pat Lowe with draft case summary and demand.	275.00	0.10	27.50
	RAP	B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP	B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
12/28/2022	GM	B180	A101	Prepare adversary complaint along with annexures.	100.00	4.00	400.00
12/29/2022	AKM	B180	A101	Review of draft adversary proceeding.	275.00	0.30	82.50
01/05/2023	GM	B180	A101	Confer with Anna MacFarlane regarding adversary complaint; review and edit adversary complaint after comments.	100.00	0.20	20.00
	AKM	B180	A101	Confer with Gaurav Mankotia regarding adversary complaint.	275.00	0.20	55.00
01/30/2023	AKM	B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.30	82.50

Lowe, Pat

Statement No. 232003

Account No 1934.024

Page: 2

Claims against Jacob Proux - Finder

					Rate	Hours	
01/31/2023	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
	AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
				For Legal Services Rendered		6.70	1,287.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.80	\$500.00	\$400.00
Anna K. MacFarlane	1.70	275.00	467.50
Gaurav Mankotia	4.20	100.00	420.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	12.96
			Total Advances	362.96

Total Current Work 1,650.46

Balance Due \$1,650.46

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	362.96
B120	Asset Analysis and Recovery	442.50	0.00
B180	Avoidance Action Analysis	845.00	0.00
B100	Administration	1,287.50	362.96

Invoices are payable upon receipt.

EXHIBIT D-25

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232004
 Account No. 1934.025

Page: 1

Claims against John M Vizy - Finder

Fees

					Rate	Hours	
10/19/2022	AKM	B120	A101	Draft demand and case summary for John M Vizy (Finder).	275.00	0.30	82.50
10/20/2022	AKM	B120	A101	Continue drafting demand and case summary for John Vizy.	275.00	0.20	55.00
	AKM	B120	A101	Email to Pat Lowe with draft case summary and demand.	275.00	0.10	27.50
	AKM	B120	A101	Finalize demand for signature and mailing.	275.00	0.10	27.50
	RAP	B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP	B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
12/28/2022	GM	B180	A101	Prepare adversary complaint along with annexures.	100.00	4.00	400.00
12/29/2022	AKM	B180	A101	Review of draft adversary proceeding.	275.00	0.40	110.00
01/05/2023	GM	B180	A101	Confer with Anna regarding adversary complaint; review and edit adversary complaint after comments.	100.00	0.20	20.00
01/30/2023	AKM	B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.30	82.50
01/31/2023	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00

Lowe, Pat

Statement No. 232004

Account No 1934.025

Page: 2

Claims against John M Vizy - Finder

				Rate	Hours	
AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
RAP	B180	A101	Review and approve summons.	500.00	0.20	100.00
			For Legal Services Rendered		6.80	1,360.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	1.60	275.00	440.00
Gaurav Mankotia	4.20	100.00	420.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	25.92
			Total Advances	375.92

Total Current Work 1,735.92

Balance Due \$1,735.92

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	375.92
B120	Asset Analysis and Recovery	442.50	0.00
B180	Avoidance Action Analysis	917.50	0.00
B100	Administration	1,360.00	375.92

Invoices are payable upon receipt.

EXHIBIT D-26

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232005
 Account No. 1934.026

Page: 1

Claims against Mark Zabinski - Finder

Fees

				Rate	Hours	
10/19/2022	AKM B120	A101	Draft demand and case summary for Mark Zabinski (Finder).	275.00	0.50	137.50
10/20/2022	AKM B120	A101	Continue drafting demand and case summary for Mark Zabinski.	275.00	0.30	82.50
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	AKM B120	A101	Email to Pat Lowe with draft case summary and demand.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
12/27/2022	GM B180	A101	Prepare adversary complaint along with annexures.	100.00	4.00	400.00
12/28/2022	AKM B180	A101	Review of adversary complaint.	275.00	0.80	220.00
12/29/2022	AKM B120	A101	Continue review of draft adversary proceeding.	275.00	0.10	27.50
01/05/2023	GM B180	A101	Confer with Anna regarding adversary complaint; review and edit adversary complaint after comments.	100.00	0.20	20.00
01/16/2023	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.60	165.00

Lowe, Pat

Statement No. 232005

Account No 1934.026

Page: 2

Claims against Mark Zabinski - Finder

					Rate	Hours	
01/19/2023	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/30/2023	AKM	B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.30	82.50
	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
01/31/2023	AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
	RAP	B180	A101	Review and signature of summons.	500.00	0.20	100.00
				For Legal Services Rendered		8.40	1,800.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	3.20	275.00	880.00
Gaurav Mankotia	4.20	100.00	420.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	12.72
			Total Advances	362.72

Total Current Work 2,162.72

Balance Due \$2,162.72

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	362.72
B120	Asset Analysis and Recovery	552.50	0.00
B180	Avoidance Action Analysis	1247.50	0.00
B100	Administration	1,800.00	362.72

Invoices are payable upon receipt.

EXHIBIT D-27

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232006
 Account No. 1934.027

Page: 1

Metropolitan CMB/Wiley Carter - Finder

Fees

				Rate	Hours	
10/20/2022	AKM B120	A101	Draft demand and case summary for Metropolitan CMG / Wylie Carter.	275.00	0.70	192.50
	AKM B120	A101	Email to Pat Lowe with draft case summary and demand.	275.00	0.10	27.50
	AKM B120	A101	Finalize demand for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
10/31/2022	AKM B120	A101	Research address after letter returned; confer with Randall A. Pulman regarding same.	275.00	0.30	82.50
	RAP B120	A101	Confer with Anna McFarlane regarding demand letter.	500.00	0.10	50.00
12/05/2022	AKM B180	A101	Draft adversary complaint per Randall A. Pulman comments.	275.00	1.20	330.00
12/06/2022	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.50	137.50
12/07/2022	AKM B180	A101	Continue drafting adversary complaint per RAP comments and edits.	275.00	0.40	110.00
	RAP B180	A104	Final review and signature of Original Complaint.	500.00	0.20	100.00

Lowe, Pat

Statement No. 232006

Account No 1934.027

Metropolitan CMB/Wiley Carter - Finder

Page: 2

					Rate	Hours	
12/15/2022	RAP	B180	A101	Review and signature of summons.	500.00	0.20	100.00
01/26/2023	AKM	B180	A101	Draft default notice letter.	275.00	0.30	82.50
01/27/2023	AKM	B180	A101	Finalize default notice letter for mailing.	275.00	0.10	27.50
				For Legal Services Rendered		4.70	1,517.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	3.70	275.00	1,017.50

Advances

12/07/2022	B110	E124	Pay.gov - Filing fee for Adversary Complaint	350.00
			Total Advances	350.00

Total Current Work 1,867.50

Balance Due \$1,867.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	630.00	0.00
B180	Avoidance Action Analysis	887.50	0.00
B100	Administration	1,517.50	350.00

Invoices are payable upon receipt.

EXHIBIT D-28

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232007
 Account No. 1934.028

Page: 1

Claims against Purpose Driven Fin. Svcs - Finder

Fees

				Rate	Hours	
10/20/2022	AKM B120	A101	Email to Pat Lowe with draft demand and case summary.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/01/2022	AKM B120	A101	Voicemail from Zar Razack.	275.00	0.10	27.50
11/02/2022	AKM B120	A101	Telephone call with Crissman Crombie regarding demand letter.	275.00	0.20	55.00
	AKM B120	A101	Telephone call with Zaheer Razack regarding demand letter.	275.00	0.30	82.50
11/03/2022	AKM B120	A101	Confer with Randall A. Pulman regarding Zaheer Razack phone calls.	275.00	0.30	82.50
12/02/2022	AKM B180	A101	Begin draft of adversary complaint.	275.00	0.30	82.50
12/03/2022	AKM B180	A101	Continue drafting adversary complaint and conducting legal research regarding same.	275.00	1.20	330.00
12/05/2022	AKM B180	A101	Continue drafting complaint per Randall A. Pulman comments and edits; send to Pat Lowe for review.	275.00	0.50	137.50

Lowe, Pat

Statement No. 232007

Account No 1934.028

Page: 2

Claims against Purpose Driven Fin. Svcs - Finder

					Rate	Hours	
12/06/2022	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.50	137.50
12/07/2022	AKM	B180	A101	Continue drafting adversary complaint per RAP comments and edits.	275.00	0.40	110.00
	RAP	B180	A104	Final review and signature of Original Complaint.	500.00	0.20	100.00
12/15/2022	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
01/27/2023	AKM	B180	A101	Finalize default notice letter for mailing.	275.00	0.30	82.50
				For Legal Services Rendered		5.20	1,632.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.90	\$500.00	\$450.00
Anna K. MacFarlane	4.30	275.00	1,182.50

Advances

12/07/2022	B110	E124	Pay.gov - Filing fee for Adversary Complaint	350.00
			Total Advances	350.00
			Total Current Work	1,982.50

Balance Due \$1,982.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	552.50	0.00
B180	Avoidance Action Analysis	1080.00	0.00
B100	Administration	1,632.50	350.00

Invoices are payable upon receipt.

EXHIBIT D-29

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232008
 Account No. 1934.029

Page: 1

Claims against Premier Group Enterpr. - Finder

Fees

				Rate	Hours	
10/20/2022	AKM B120	A101	Draft demand and case summary for Premier Group Enterprises.	275.00	0.50	137.50
	AKM B120	A101	Email to Pat Lowe with draft demand and case summary.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
	AKM B120	A101	Draft demand and case summary for Premier Group Enterprises.	275.00	1.10	302.50
10/31/2022	WDM B180	A103	Draft/revise subpoena duces tecum to Premier Global Corporation.	375.00	1.80	675.00
12/29/2022	AKM B180	A101	Review of draft adversary proceeding.	275.00	0.50	137.50
	GM B180	A101	Prepare adversary complaint along with annexures.	100.00	4.00	400.00
01/05/2023	GM B180	A101	Confer with Anna regarding adversary complaint; review and edit adversary complaint after comments.	100.00	0.20	20.00
01/24/2023	AKM B180	A101	Confer with W. Drew Mallender regarding Premier Group.	275.00	0.20	55.00
	WDM B180	A105	Meet with Anna Macfarlane regarding potential adversary against Premier			

Lowe, Pat

Statement No. 232008

Account No 1934.029

Claims against Premier Group Enterpr. - Finder

Page: 2

					Rate	Hours	
			Global.		375.00	0.20	75.00
01/30/2023	AKM	B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.30	82.50
01/31/2023	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
	AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
				For Legal Services Rendered		10.20	2,495.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
W. Drew Mallender	2.00	375.00	750.00
Anna K. MacFarlane	3.00	275.00	825.00
Gaurav Mankotia	4.20	100.00	420.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	38.88
			Total Advances	388.88
			Total Current Work	2,883.88

Balance Due \$2,883.88

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	388.88
B120	Asset Analysis and Recovery	745.00	0.00
B180	Avoidance Action Analysis	1750.00	0.00
B100	Administration	2,495.00	388.88

Invoices are payable upon receipt.

EXHIBIT D-30

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232009
 Account No. 1934.030

Page: 1

Claims against Dennis Wirth, Agent Advisory Group

Fees

					Rate	Hours	
10/14/2022	RAP	B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same. (Wirth)	500.00	0.30	150.00
	RAP	B120	A104	Review, approval and signature of demand letter. (Wirth)	500.00	0.20	100.00
	AKM	B120	A101	Draft of demand to Dennis Wirth (finder).	275.00	0.60	165.00
10/17/2022	AKM	B120	A101	Continue drafting demand letter to Dennis Wirth and First Fidelity; research conflict issues.	275.00	0.60	165.00
	AKM	B120	A101	Confer with Randall A. Pulman regarding Dennis Wirth/First Fidelity conflict.	275.00	0.10	27.50
	AKM	B120	A101	Draft conflict waiver letter for Dennis Wirth/First Fidelity conflict.	275.00	0.50	137.50
10/19/2022	AKM	B180	A101	Continue drafting conflict waiver letter per Randall A. Pulman comments and edits (Wirth).	275.00	0.60	165.00
10/20/2022	AKM	B120	A101	Draft demand and case summary.	275.00	0.70	192.50
	AKM	B120	A101	Email to Pat Lowe with draft demand and case summary.	275.00	0.10	27.50
	AKM	B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP	B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP	B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00

Lowe, Pat

Statement No. 232009

Account No 1934.030

Page: 2

Claims against Dennis Wirth, Agent Advisory Grou

					Rate	Hours	
11/01/2022	RAP	B120	A109	Final review and signature of Conflict Waiver Letter.	500.00	0.20	100.00
11/14/2022	AKM	B120	A101	Review of returned mail - OK spoke to attorney.	275.00	0.10	27.50
11/29/2022	AKM	B120	A101	Prepare and finalize potential case summary and demand to Wirth / First Fidelity.	275.00	0.60	165.00
	AKM	B120	A101	Finalizing Wirth/First Fidelity letter for signature and mailing.	275.00	0.10	27.50
	RAP	B180	A101	Review and signature of demand letter.	500.00	0.30	150.00
12/05/2022	AKM	B180	A101	Attention to emails regarding conflict (Wirth).	275.00	0.20	55.00
	AKM	B180	A101	Drafting adversary complaint; confer with Randall A. Pulman regarding comments and edits (Wirth); send to Pat Lowe for review.	275.00	1.00	275.00
12/06/2022	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits (Wirth).	275.00	0.50	137.50
12/07/2022	RAP	B180	A104	Final review and signature of Original Complaint.	500.00	0.20	100.00
	AKM	B180	A101	Continue drafting adversary complaint per RAP comments and edits.	275.00	0.40	110.00
	RAP	B180	A104	Final review and signature of Original Complaint.	500.00	0.20	100.00
12/09/2022	AKM	B180	A101	Calls with Dennis Wirth.	275.00	0.30	82.50
	AKM	B180	A101	Confer with Randall A. Pulman regarding Wirth phone call.	275.00	0.20	55.00
	AKM	B180	A101	Draft letter to Pat re Wirth conflict.	275.00	2.00	550.00
	RAP	B180	A104	Review and edit of letter to Lowe regarding conflict.	500.00	0.20	100.00
	RAP	B180	A104	Confer with Anna MacFarlane regarding Wirth phone call.	500.00	0.20	100.00
12/12/2022	AKM	B180	A101	Confer with Randall A. Pulman regarding			

Lowe, Pat

Statement No. 232009

Account No 1934.030

Page: 3

Claims against Dennis Wirth, Agent Advisory Grou

				Rate	Hours	
			next steps.	275.00	0.20	55.00
	AKM	B180	A101 Finalizing letter to Dennis Wirth.	275.00	0.50	137.50
	AKM	B180	A101 Email to Dennis Wirth.	275.00	0.10	27.50
12/15/2022	RAP	B180	A104 Review and signature of summons.	500.00	0.20	100.00
12/20/2022	AKM	B180	A101 Attention to correspondence regarding Wirth letter.	275.00	0.10	27.50
	RAP	B180	A107 Review and signature of letter to Lowe regarding conflict with Agents Advisory Group, LLC; review of e-mail regarding instructions to dismiss AAG.	500.00	0.30	150.00
01/06/2023	AKM	B180	A101 Review of Dennis Wirth answer.	275.00	0.20	55.00
01/25/2023	AKM	B180	A101 Attention to scheduling order deadlines and issues.	275.00	0.30	82.50
	AKM	B180	A101 Draft nonsuit and order regarding same as to Agent Advisory Group only.	275.00	0.50	137.50
01/30/2023	AKM	B180	A101 Review and approval of statement regarding consent.	275.00	0.10	27.50
	AKM	B180	A101 Finalize notice of dismissal of Agent Advisory Group for Randall A. Pulman final review.	275.00	0.20	55.00
			For Legal Services Rendered		13.70	4,397.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	2.80	\$500.00	\$1,400.00
Anna K. MacFarlane	10.90	275.00	2,997.50

Advances

12/07/2022	B110	E124	Pay.gov - Filing fee for Adversary Complaint	350.00
			Total Advances	350.00
			Total Current Work	4,747.50

Lowe, Pat

Statement No. 232009

Account No 1934.030

Claims against Dennis Wirth, Agent Advisory Grou

Page: 4

Balance Due

\$4,747.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	1562.50	0.00
B180	Avoidance Action Analysis	2835.00	0.00
B100	Administration	4,397.50	350.00

Invoices are payable upon receipt.

EXHIBIT D-31

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232010
 Account No. 1934.031

Page: 1

Claims against Michael Cales - Finder

Fees

				Rate	Hours	
10/20/2022	AKM B120	A101	Draft demand and case summary for Michael Cales.	275.00	0.40	110.00
	AKM B120	A101	Email to Pat Lowe with draft demands and case summaries.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/14/2022	AKM B120	A101	Review of returned mail and addresses on demand letter.	275.00	0.10	27.50
12/01/2022	AKM B180	A101	Prepare draft adversary complaint.	275.00	0.40	110.00
12/05/2022	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits; send to Pat Lowe for review.	275.00	0.50	137.50
12/06/2022	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.60	165.00
12/07/2022	AKM B180	A101	Continue drafting adversary complaint per RAP comments and edits.	275.00	0.40	110.00
	RAP B180	A104	Final review and signature of Original Complaint.	500.00	0.20	100.00

Lowe, Pat

Statement No. 232010

Account No 1934.031

Page: 2

Claims against Michael Cales - Finder

					Rate	Hours	
12/15/2022	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
01/23/2023	AKM	B180	A101	Drafting initial disclosures; review of file regarding same; relevant legal research.	275.00	1.50	412.50
	AKM	B180	A101	Office conference with Randall A. Pulman regarding initial disclosures and research.	275.00	0.20	55.00
	RAP	B180	A101	Office conference with Anna MacFarlane regarding initial disclosures and research.	500.00	0.20	100.00
01/24/2023	AKM	B180	A101	Finalizing disclosures per Randall A. Pulman comments and edits.	275.00	1.30	357.50
	AKM	B180	A101	Serving disclosures via email on opposing counsel.	275.00	0.20	55.00
	RAP	B180	A104	Review and edit of disclosures.	500.00	0.20	100.00
01/25/2023	AKM	B180	A101	Attention to scheduling order deadlines and issues.	275.00	0.30	82.50
01/30/2023	AKM	B180	A101	Review and approval of statement regarding consent.	275.00	0.10	27.50
				For Legal Services Rendered		7.50	2,355.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.30	\$500.00	\$650.00
Anna K. MacFarlane	6.20	275.00	1,705.00

Advances

12/07/2022	B110	E124	Pay.gov - Filing fee for Adversary Complaint	350.00
			Total Advances	350.00

Total Current Work 2,705.00

Balance Due \$2,705.00

Lowe, Pat

Statement No. 232010

Account No 1934.031

Page: 3

Claims against Michael Cales - Finder

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	442.50	0.00
B180	Avoidance Action Analysis	1912.50	0.00
B100	Administration	2,355.00	350.00

Invoices are payable upon receipt.

EXHIBIT D-32

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232011
 Account No. 1934.032

Page: 1

Claims against George M Villa - Finder

Fees

				Rate	Hours	
10/20/2022	AKM B120	A101	Draft demand and case summary for George Villa.	275.00	0.80	220.00
	AKM B120	A101	Compiling documents to email case summary and draft demand to Pat Lowe.	275.00	0.10	27.50
10/21/2022	AKM B120	A101	Email to Pat Lowe with case summary and draft demand letter.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
12/02/2022	AKM B180	A101	Draft adversary complaint.	275.00	0.50	137.50
12/05/2022	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits; send to Pat Lowe for review.	275.00	0.50	137.50
12/06/2022	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.50	137.50
12/07/2022	AKM B180	A101	Continue drafting adversary complaint per RAP comments and edits.	275.00	0.40	110.00
	RAP B180	A104	Final review and signature of Original Complaint.	500.00	0.20	100.00

Lowe, Pat

Statement No. 232011

Account No 1934.032

Page: 2

Claims against George M Villa - Finder

					Rate	Hours	
12/15/2022	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
01/27/2023	AKM	B180	A101	Finalize default notice letter for mailing.	275.00	0.30	82.50
				For Legal Services Rendered		4.20	1,357.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.90	\$500.00	\$450.00
Anna K. MacFarlane	3.30	275.00	907.50

Advances

12/07/2022	B110	E124	Pay.gov - Filing fee for Adversary Complaint	350.00
			Total Advances	350.00
			Total Current Work	1,707.50

Balance Due \$1,707.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	552.50	0.00
B180	Avoidance Action Analysis	805.00	0.00
B100	Administration	1,357.50	350.00

Invoices are payable upon receipt.

EXHIBIT D-33

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232012
 Account No. 1934.033

Page: 1

Claims against Randy Seymour - Finder

Fees

					Rate	Hours	
10/20/2022	AKM	B120	A101	Draft demand and case summary for Randy Seymour.	275.00	0.50	137.50
	AKM	B120	A101	Compiling documents to email case summary and draft demand to Pat Lowe.	275.00	0.20	55.00
10/21/2022	AKM	B120	A101	Email to Pat Lowe with case summary and draft demand letter.	275.00	0.10	27.50
	AKM	B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP	B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP	B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
01/02/2023	GM	B180	A101	Prepare draft Adversary Complaint along with exhibits.	100.00	2.00	200.00
01/03/2023	AKM	B180	A101	Confer with Gaurav Mankotia regarding draft complaint.	275.00	0.10	27.50
	GM	B180	A101	Continue prepare draft Adversary Complaint along with exhibits.	100.00	2.00	200.00
01/04/2023	AKM	B180	A101	Review of draft adversary complaint.	275.00	0.40	110.00
01/05/2023	GM	B180	A101	Confer with Anna regarding adversary complaint; review and edit adversary complaint after comments.	100.00	0.20	20.00

Lowe, Pat

Statement No. 232012

Account No 1934.033

Page: 2

Claims against Randy Seymour - Finder

					Rate	Hours	
01/06/2023	GM	B180	A101	Search on Westlaw regarding earliest claim filed against deeproot Funds, LLC. from 118 claims: confer with Anna regarding same.	100.00	4.00	400.00
01/09/2023	AKM	B180	A101	Review of draft adversary proceeding.	275.00	1.00	275.00
01/11/2023	AKM	B180	A101	Confer with Gaurav Mankotia regarding complaint.	275.00	0.10	27.50
01/12/2023	AKM	B180	A101	Continue drafting adversary proceeding complaint.	275.00	0.70	192.50
01/16/2023	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/19/2023	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/30/2023	AKM	B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	1.90	522.50
	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
01/31/2023	AKM	B180	A101	Final review of draft adversary complaint for filing.	275.00	0.20	55.00
	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
				For Legal Services Rendered		14.90	2,887.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	5.70	275.00	1,567.50
Gaurav Mankotia	8.20	100.00	820.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	12.72
			Total Advances	362.72

Lowe, Pat

Statement No. 232012

Account No 1934.033

Claims against Randy Seymour - Finder

Page: 3

Total Current Work 3,250.22

Balance Due \$3,250.22

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	362.72
B120	Asset Analysis and Recovery	497.50	0.00
B180	Avoidance Action Analysis	2390.00	0.00
B100	Administration	2,887.50	362.72

Invoices are payable upon receipt.

EXHIBIT D-34

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232013
 Account No. 1934.034

Page: 1

Claims against Raul T Gomez - Finder

Fees

				Rate	Hours	
10/20/2022	AKM B120	A101	Draft demand and case summary for Raul T Gomez.	275.00	0.40	110.00
	AKM B120	A101	Compiling documents to email case summary and draft demand to Pat Lowe.	275.00	0.20	55.00
10/21/2022	AKM B120	A101	Email to Pat Lowe with case summary and draft demand letter.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
12/07/2022	RAP B180	A104	Final review and signature of Original Complaint.	500.00	0.20	100.00
12/29/2022	AKM B180	A101	Review of draft adversary proceeding.	275.00	0.30	82.50
	GM B180	A101	Prepare adversary complaint along with annexures	100.00	4.00	400.00
01/05/2023	GM B180	A101	Confer with Anna regarding adversary complaint; review and edit adversary complaint after comments.	100.00	0.20	20.00
01/30/2023	AKM B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.20	55.00

Lowe, Pat

Statement No. 232013

Account No 1934.034

Page: 2

Claims against Raul T Gomez - Finder

					Rate	Hours	
01/31/2023	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
	AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
				For Legal Services Rendered		6.90	1,432.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.20	\$500.00	\$600.00
Anna K. MacFarlane	1.50	275.00	412.50
Gaurav Mankotia	4.20	100.00	420.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	12.72
			Total Advances	362.72
			Total Current Work	1,795.22

Balance Due \$1,795.22

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	362.72
B120	Asset Analysis and Recovery	470.00	0.00
B180	Avoidance Action Analysis	962.50	0.00
B100	Administration	1,432.50	362.72

Invoices are payable upon receipt.

EXHIBIT D-35

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232014
 Account No. 1934.035

Page: 1

Claims against RD and J, Inc. - Finder

Fees

				Rate	Hours	
10/20/2022	AKM B120	A101	Draft demand and case summary for RD & J, Inc.	275.00	0.50	137.50
	AKM B120	A101	Compiling documents to email case summary and draft demand to Pat Lowe.	275.00	0.10	27.50
10/21/2022	AKM B120	A101	Email to Pat Lowe with case summary and draft demand letter.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
12/02/2022	AKM B180	A101	Draft adversary complaint.	275.00	0.50	137.50
12/05/2022	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits; send to Pat Lowe for review.	275.00	0.50	137.50
12/06/2022	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.60	165.00
12/07/2022	AKM B180	A101	Continue drafting adversary complaint per RAP comments and edits.	275.00	0.40	110.00
	RAP B180	A104	Review and approval of original complaints for filing.	500.00	0.30	150.00

Lowe, Pat

Statement No. 232014
Account No 1934.035
Page: 2

Claims against RD and J, Inc. - Finder

					Rate	Hours	
12/15/2022	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
01/25/2023	AKM	B180	A101	Attention to scheduling order deadlines and issues.	275.00	0.30	82.50
01/30/2023	AKM	B180	A101	Review and approval of statement regarding consent.	275.00	0.10	27.50
				For Legal Services Rendered		4.20	1,380.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	3.20	275.00	880.00

Advances

12/07/2022	B110	E124	Pay.gov - Filing fee for Adversary Complaint	350.00
			Total Advances	350.00
			Total Current Work	1,730.00
			Balance Due	<u>\$1,730.00</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	470.00	0.00
B180	Avoidance Action Analysis	910.00	0.00
B100	Administration	1,380.00	350.00

Invoices are payable upon receipt.

EXHIBIT D-36

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232015
 Account No. 1934.036

Page: 1

Claims against David Rosen - Finder

Fees

				Rate	Hours	
10/20/2022	AKM B120	A101	Draft demand and case summary for David Rosen.	275.00	0.80	220.00
	AKM B120	A101	Compiling documents to email case summary and draft demand to Pat Lowe.	275.00	0.10	27.50
10/21/2022	AKM B120	A101	Email to Pat Lowe with case summary and draft demand letter.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	AKM B120	A101	Revising demand to David Rosen.	275.00	0.40	110.00
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/10/2022	AKM B120	A101	Review of returned mail, address research for re-sending, confer with Randall A. Pulman regarding same.	275.00	0.30	82.50
	RAP B120	A101	Confer with Anna MacFarlane regarding return of demand letter.	500.00	0.10	50.00
01/02/2023	GM B180	A101	Prepare draft Adversary Complaint along with exhibits.	100.00	4.00	400.00
01/09/2023	AKM B180	A101	Review of draft adversary proceeding.	275.00	0.70	192.50
01/16/2023	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.40	110.00

Lowe, Pat

Statement No. 232015

Account No 1934.036

Page: 2

Claims against David Rosen - Finder

					Rate	Hours	
01/19/2023	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/30/2023	AKM	B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.30	82.50
	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
01/31/2023	AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
				For Legal Services Rendered		8.70	1,940.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.10	\$500.00	\$550.00
Anna K. MacFarlane	3.60	275.00	990.00
Gaurav Mankotia	4.00	100.00	400.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	12.96
			Total Advances	362.96

Total Current Work 2,302.96

Balance Due \$2,302.96

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	362.96
B120	Asset Analysis and Recovery	795.00	0.00
B180	Avoidance Action Analysis	1145.00	0.00
B100	Administration	1,940.00	362.96

Invoices are payable upon receipt.

EXHIBIT D-37

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232016
 Account No. 1934.037

Page: 1

Claims against Bob Patrick

Fees

				Rate	Hours	
10/21/2022	AKM B120	A101	Draft case summary and demand letter for Bob Patrick.	275.00	0.40	110.00
10/24/2022	AKM B120	A101	Email to Pat Lowe with draft case summary and demand letter.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand letter for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/29/2022	AKM B120	A101	Voicemail from Bob Patrick.	275.00	0.10	27.50
			For Legal Services Rendered		1.20	442.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.50	\$500.00	\$250.00
Anna K. MacFarlane	0.70	275.00	192.50

Total Current Work 442.50

Balance Due \$442.50

Lowe, Pat

Statement No. 232016

Account No 1934.037

Claims against Bob Patrick

Page: 2

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	442.50	0.00
B100	Administration	442.50	0.00

Invoices are payable upon receipt.

EXHIBIT D-38

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232017
 Account No. 1934.038

Page: 1

Claims against Crissman Crombie

Fees

				Rate	Hours	
10/21/2022	AKM B120	A101	Draft case summary and demand letter for Crissman Crombie.	275.00	0.30	82.50
10/24/2022	AKM B120	A101	Email to Pat Lowe with draft case summary and demand letter.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand letter for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/01/2022	AKM B120	A101	Voicemail from Crissman Crombie.	275.00	0.10	27.50
01/01/2023	GM B180	A101	Prepare draft Adversary Complaint along with exhibits.	100.00	4.00	400.00
01/04/2023	AKM B180	A101	Review of draft adversary complaint.	275.00	0.30	82.50
01/05/2023	GM B180	A101	Confer with Anna regarding adversary complaint; review and edit adversary complaint after comments.	100.00	0.20	20.00
01/30/2023	AKM B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.20	55.00
01/31/2023	RAP B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00

Lowe, Pat

Statement No. 232017

Account No 1934.038

Page: 2

Claims against Crissman Crombie

				Rate	Hours	
AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
			For Legal Services Rendered		6.50	1,277.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	1.30	275.00	357.50
Gaurav Mankotia	4.20	100.00	420.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	12.72
			Total Advances	362.72

Total Current Work 1,640.22

Balance Due \$1,640.22

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	362.72
B120	Asset Analysis and Recovery	415.00	0.00
B180	Avoidance Action Analysis	862.50	0.00
B100	Administration	1,277.50	362.72

Invoices are payable upon receipt.

EXHIBIT D-39

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232018
 Account No. 1934.039

Page: 1

Claims against Agents Insur. Sales & Svc - Finder

Fees

				Rate	Hours	
10/21/2022	AKM B120	A101	Draft case summary and demand letter for Agents Insurance.	275.00	0.60	165.00
10/24/2022	AKM B120	A101	Email to Pat Lowe with draft case summary and demand letter.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand letter for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
01/03/2023	AKM B180	A101	Confer with Gaurav Mankotia regarding draft adversary complaint.	275.00	0.20	55.00
	AKM B180	A101	Confer with Randall A. Pulman regarding venue of adversary complaint.	275.00	0.10	27.50
01/05/2023	AKM B180	A101	Confer with Pat Lowe and Randall A. Pulman regarding venue issue.	275.00	0.10	27.50
	AKM B180	A101	Confer with Randall A. Pulman and Gaurav Mankotia regarding venue.	275.00	0.20	55.00
01/12/2023	GM B180	A101	Prepare draft Adversary Complaint along with exhibits.	100.00	4.00	400.00
01/17/2023	AKM B180	A101	Continue drafting adversary complaint.	275.00	0.70	192.50
01/30/2023	AKM B180	A101	Continue drafting adversary complaint per			

Lowe, Pat

Statement No. 232018
Account No 1934.039
Page: 2

Claims against Agents Insur. Sales & Svc - Finder

					Rate	Hours	
				Leslie S. Hyman comments and edits.	275.00	0.20	55.00
01/31/2023	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
	AKM	B180	A101	Continue drafting adversary proceeding complaint per Randall A. Pulman and Leslie S. Hyman comments and edits (claims against Agents Insurance, Savings Options and Solutions, Barry Wilken, and David Obmann).	275.00	2.10	577.50
	AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.50	137.50
	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
				For Legal Services Rendered		9.90	2,247.50
Recapitulation							
	<u>Timekeeper</u>				<u>Hours</u>	<u>Rate</u>	<u>Total</u>
	Randall A. Pulman				1.00	\$500.00	\$500.00
	Anna K. MacFarlane				4.90	275.00	1,347.50
	Gaurav Mankotia				4.00	100.00	400.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	68.40
			Total Advances	418.40
			Total Current Work	2,665.90
			Balance Due	<u>\$2,665.90</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	418.40
B120	Asset Analysis and Recovery	470.00	0.00
B180	Avoidance Action Analysis	1777.50	0.00
B100	Administration	2,247.50	418.40

Lowe, Pat

Statement No. 232018

Account No 1934.039

Claims against Agents Insur. Sales & Svc - Finder

Page: 3

Invoices are payable upon receipt.

EXHIBIT D-40

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232019
 Account No. 1934.040

Page: 1

Claims against Hart Financial - Finder

Fees

				Rate	Hours	
10/21/2022	AKM B120	A101	Draft case summary and demand letter for Hart Financial.	275.00	0.70	192.50
10/24/2022	AKM B120	A101	Email to Pat Lowe with draft case summary and demand letter.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand letter for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/10/2022	AKM B120	A101	Review of letter from Hart's assistant regarding hospitalization.	275.00	0.10	27.50
			For Legal Services Rendered		1.50	525.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.50	\$500.00	\$250.00
Anna K. MacFarlane	1.00	275.00	275.00

Total Current Work 525.00

Balance Due \$525.00

Lowe, Pat

Statement No. 232019

Account No 1934.040

Claims against Hart Financial - Finder

Page: 2

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	525.00	0.00
B100	Administration	525.00	0.00

Invoices are payable upon receipt.

EXHIBIT D-41

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232020
 Account No. 1934.041

Page: 1

Claims against Savings Options & Solutions - Finder

Fees

				Rate	Hours	
10/21/2022	AKM B120	A101	Draft case summary and demand letter for Savings Options.	275.00	0.70	192.50
10/24/2022	AKM B120	A101	Email to Pat Lowe with draft case summary and demand letter.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand letter for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
			For Legal Services Rendered		1.40	497.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.50	\$500.00	\$250.00
Anna K. MacFarlane	0.90	275.00	247.50

Total Current Work 497.50

Balance Due \$497.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	497.50	0.00

Lowe, Pat

Statement No. 232020

Account No 1934.041

Page: 2

Claims against Savings Options & Solutions - Finde

		<u>Fees</u>	<u>Expenses</u>
B100	Administration	497.50	0.00

Invoices are payable upon receipt.

EXHIBIT D-42

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232021
 Account No. 1934.042

Page: 1

Claims against Shantell Wright - Finder

Fees

					Rate	Hours	
10/21/2022	AKM	B120	A101	Draft case summary and demand letter for Shantell Wright.	275.00	0.60	165.00
10/24/2022	AKM	B120	A101	Email to Pat Lowe with draft case summary and demand letter.	275.00	0.10	27.50
	AKM	B120	A101	Finalizing demand letter for signature and mailing.	275.00	0.10	27.50
	RAP	B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP	B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
01/10/2023	GM	B180	A101	Prepare draft Adversary Complaint along with exhibits.	100.00	4.00	400.00
01/11/2023	AKM	B180	A101	Review of draft adversary complaint.	275.00	0.90	247.50
01/12/2023	AKM	B180	A101	Continue drafting adversary proceeding complaint.	275.00	0.30	82.50
01/16/2023	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/19/2023	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/30/2023	AKM	B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.60	165.00

Lowe, Pat

Statement No. 232021
Account No 1934.042
Page: 2

Claims against Shantell Wright - Finder

				Rate	Hours	
	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30 150.00
01/31/2023	AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20 55.00
	RAP	B180	A104	Review and signature of summons.	500.00	0.20 100.00
				For Legal Services Rendered		8.20 1,780.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	3.20	275.00	880.00
Gaurav Mankotia	4.00	100.00	400.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	25.44
			Total Advances	375.44
			Total Current Work	2,155.44

Balance Due \$2,155.44

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	375.44
B120	Asset Analysis and Recovery	470.00	0.00
B180	Avoidance Action Analysis	1310.00	0.00
B100	Administration	1,780.00	375.44

Invoices are payable upon receipt.

EXHIBIT D-43

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232022
 Account No. 1934.043

Page: 1

Claims against Steven Fortier - Finder

Fees

					Rate	Hours	
10/21/2022	AKM	B120	A101	Draft case summary and demand letter for Steven Fortier.	275.00	0.30	82.50
10/24/2022	AKM	B120	A101	Email to Pat Lowe with draft case summary and demand letter.	275.00	0.10	27.50
	AKM	B120	A101	Finalizing demand letter for signature and mailing.	275.00	0.10	27.50
	RAP	B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP	B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/10/2022	AKM	B120	A101	Review of returned mail, address research for re-sending, confer with Randall A. Pulman regarding same.	275.00	0.30	82.50
01/02/2023	GM	B180	A101	Prepare draft Adversary Complaint along with exhibits.	100.00	4.00	400.00
01/09/2023	AKM	B180	A101	Review of draft adversary proceeding.	275.00	1.10	302.50
01/12/2023	AKM	B180	A101	Continue drafting adversary proceeding complaint.	275.00	0.50	137.50
01/16/2023	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/19/2023	AKM	B180	A101	Continue drafting adversary complaint per			

Lowe, Pat

Statement No. 232022

Account No 1934.043

Page: 2

Claims against Steven Fortier - Finder

					Rate	Hours	
				Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/30/2023	AKM	B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.30	82.50
01/31/2023	AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
	RAP	B180	A104	Review, approve and signature of plaintiff's complaint.	500.00	0.30	150.00
	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
				For Legal Services Rendered		8.30	1,807.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	3.30	275.00	907.50
Gaurav Mankotia	4.00	100.00	400.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	12.96
			Total Advances	362.96

Total Current Work 2,170.46

Balance Due \$2,170.46

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	362.96
B120	Asset Analysis and Recovery	470.00	0.00
B180	Avoidance Action Analysis	1337.50	0.00
B100	Administration	1,807.50	362.96

Invoices are payable upon receipt.

EXHIBIT D-44

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232023
 Account No. 1934.044

Page: 1

Claims against David Obman - Finder

Fees

				Rate	Hours	
10/21/2022	AKM B120	A101	Draft case summary and demand letter for David Obmann.	275.00	0.50	137.50
10/24/2022	AKM B120	A101	Email to Pat Lowe with draft case summary and demand letter.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand letter for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/01/2022	AKM B120	A101	Review of correspondence with David Obmann.	275.00	0.30	82.50
	RAP B180	A109	Review of e-mail correspondence from Obmann regarding questions on claims; e-mail regarding same.	500.00	0.30	150.00
11/04/2022	AKM B120	A101	Review of correspondence from Obmann and attachments.	275.00	0.20	55.00
11/08/2022	AKM B120	A101	Review of Obmann letter received in mail.	275.00	0.10	27.50
01/03/2023	AKM B180	A101	Confer with Gaurav Mankotia regarding draft adversary complaint.	275.00	0.20	55.00
01/04/2023	AKM B180	A101	Email to Pat Lowe regarding venue issue.	275.00	0.20	55.00

Lowe, Pat

Statement No. 232023

Account No 1934.044

Page: 2

Claims against David Obman - Finder

	Rate	Hours	
For Legal Services Rendered		2.50	867.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.80	\$500.00	\$400.00
Anna K. MacFarlane	1.70	275.00	467.50

Total Current Work	867.50
--------------------	--------

Balance Due	<u>\$867.50</u>
--------------------	------------------------

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	607.50	0.00
B180	Avoidance Action Analysis	260.00	0.00
B100	Administration	867.50	0.00

Invoices are payable upon receipt.

EXHIBIT D-45

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232024
 Account No. 1934.045

Page: 1

Claims against Scott Nazarino - Finder

Fees

				Rate	Hours	
10/21/2022	AKM B120	A101	Draft case summary and demand letter for Scott Nazarino.	275.00	0.30	82.50
10/24/2022	AKM B120	A101	Email to Pat Lowe with draft case summary and demand letter.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand letter for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/10/2022	AKM B120	A101	Review of returned mail, address research for re-sending, confer with Randall A. Pulman regarding same.	275.00	0.30	82.50
	RAP B120	A101	Confer with Anna MacFarlane regarding returned demand letter.	500.00	0.10	50.00
01/03/2023	AKM B180	A101	Confer with Gaurav Mankotia regarding draft adversary complaint.	275.00	0.20	55.00
	GM B180	A101	Prepare draft Adversary Complaint along with exhibits.	100.00	4.00	400.00
01/04/2023	AKM B180	A101	Review of draft adversary complaint.	275.00	0.40	110.00
	AKM B180	A101	Updating demand letter.	275.00	0.10	27.50
01/10/2023	AKM B180	A101	Confer with Randall A. Pulman regarding updated demand.	275.00	0.10	27.50

Lowe, Pat

Statement No. 232024

Account No 1934.045

Page: 2

Claims against Scott Nazarino - Finder

				Rate	Hours	
01/11/2023	AKM B120	A101	Finalize amended demand for signature and mailing.	275.00	0.30	82.50
	AKM B120	A101	Confer with Gaurav Mankotia regarding complaint.	275.00	0.20	55.00
	AKM B120	A101	Confer with Randall A. Pulman regarding amended demand.	275.00	0.10	27.50
	AKM B180	A101	Continue drafting adversary complaint.	275.00	0.10	27.50
01/12/2023	AKM B180	A101	Continue drafting adversary proceeding complaint.	275.00	0.50	137.50
01/16/2023	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/19/2023	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/31/2023	RAP B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
	AKM B180	A101	Continue drafting adversary proceeding complaint per Randall A. Pulman and Leslie S. Hyman comments and edits.	275.00	0.30	82.50
	AKM B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
	RAP B180	A104	Review and signature of summons.	500.00	0.20	100.00
			For Legal Services Rendered		8.80	1,967.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.10	\$500.00	\$550.00
Anna K. MacFarlane	3.70	275.00	1,017.50
Gaurav Mankotia	4.00	100.00	400.00

Advances

01/10/2023	B110	E106	Online research - TransUnion	5.00
01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	12.72
			Total Advances	367.72

Lowe, Pat

Statement No. 232024

Account No 1934.045

Claims against Scott Nazarino - Finder

Page: 3

Total Current Work 2,335.22

Balance Due \$2,335.22

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	367.72
B120	Asset Analysis and Recovery	685.00	0.00
B180	Avoidance Action Analysis	1282.50	0.00
B100	Administration	1,967.50	367.72

Invoices are payable upon receipt.

EXHIBIT D-46

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232025
 Account No. 1934.046

Page: 1

Claims against Senior Insurance Services - Finder

Fees

				Rate	Hours	
10/21/2022	AKM B120	A101	Draft case summary and demand letter for Senior Insurance Services.	275.00	0.50	137.50
10/24/2022	AKM B120	A101	Email to Pat Lowe with draft case summary and demand letter.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand letter for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/02/2022	AKM B120	A101	Telephone calls with Eric Rudd regarding demand letter.	275.00	0.30	82.50
	AKM B120	A101	Confer with Randall A. Pulman regarding telephone call with Eric Rudd.	275.00	0.10	27.50
	RAP B120	A101	Confer with Anna MacFarlane regarding telephone call with Eric Rudd.	500.00	0.10	50.00
11/07/2022	AKM B120	A101	Left voicemail for Eric Rudd.	275.00	0.10	27.50
11/14/2022	AKM B120	A101	Phone call with Eric Rudd (principal) (0.1); confer with Randall A. Pulman regarding same (0.1).	275.00	0.10	27.50
	RAP B120	A101	Confer with Anna MacFarlane regarding telephone call with Eric Rudd.	500.00	0.10	50.00
12/19/2022	AKM B180	A101	Confer with Gaurav Mankotia regarding			

Lowe, Pat

Statement No. 232025

Account No 1934.046

Page: 2

Claims against Senior Insurance Services - Finder

				Rate	Hours	
			draft of adversary complaint.	275.00	0.50	137.50
	AKM	B180	A101 Review of draft adversary complaint.	275.00	0.70	192.50
	GM	B180	A101 Prepare adversary complaint along with annexures	100.00	4.00	400.00
01/16/2023	AKM	B180	A101 Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.40	110.00
01/19/2023	AKM	B180	A101 Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/30/2023	AKM	B180	A101 Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.40	110.00
	RAP	B180	A104 Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
01/31/2023	AKM	B180	A101 Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
	RAP	B180	A104 Review and signature of summons.	500.00	0.20	100.00
			For Legal Services Rendered		8.90	2,017.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.20	\$500.00	\$600.00
Anna K. MacFarlane	3.70	275.00	1,017.50
Gaurav Mankotia	4.00	100.00	400.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	39.60
			Total Advances	389.60

Total Current Work 2,407.10

Balance Due \$2,407.10

Lowe, Pat

Statement No. 232025

Account No 1934.046

Claims against Senior Insurance Services - Finder

Page: 3

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	389.60
B120	Asset Analysis and Recovery	707.50	0.00
B180	Avoidance Action Analysis	1310.00	0.00
B100	Administration	2,017.50	389.60

Invoices are payable upon receipt.

EXHIBIT D-47

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232026
 Account No. 1934.047

Page: 1

Claims against Safe Money Solutions - Finder

Fees

				Rate	Hours	
10/21/2022	AKM B120	A101	Draft case summary and demand letter for Safe Money Solutions.	275.00	0.60	165.00
10/24/2022	AKM B120	A101	Email to Pat Lowe with draft case summary and demand letter.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand letter for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
12/01/2022	AKM B180	A101	Prepare draft adversary complaint.	275.00	0.80	220.00
12/05/2022	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits; send to Pat Lowe for review.	275.00	0.50	137.50
12/06/2022	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.60	165.00
12/07/2022	AKM B180	A101	Continue drafting adversary complaint per RAP comments and edits.	275.00	0.40	110.00
	RAP B180	A104	Final review and signature of Original Complaint.	500.00	0.20	100.00
12/13/2022	AKM B180	A101	Email to Gaurav Mankotia regarding adversary proceeding.	275.00	0.30	82.50

Lowe, Pat

Statement No. 232026

Account No 1934.047

Page: 2

Claims against Safe Money Solutions - Finder

					Rate	Hours	
12/15/2022	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
12/22/2022	AKM	B180	A101	Amending and filing First Amended Complaint, confer with Randall A. Pulman regarding same.	275.00	0.90	247.50
01/25/2023	AKM	B180	A101	Attention to scheduling order deadlines and issues.	275.00	0.30	82.50
				For Legal Services Rendered		5.50	1,715.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.90	\$500.00	\$450.00
Anna K. MacFarlane	4.60	275.00	1,265.00

Advances

12/07/2022	B110	E124	Pay.gov - Filing fee for Adversary Complaint	350.00
			Total Advances	350.00
			Total Current Work	2,065.00

Balance Due \$2,065.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	470.00	0.00
B180	Avoidance Action Analysis	1245.00	0.00
B100	Administration	1,715.00	350.00

Invoices are payable upon receipt.

EXHIBIT D-48

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232027
 Account No. 1934.048

Page: 1

Claims against CWB Investment Advisors - Finder

Fees

				Rate	Hours		
10/24/2022	AKM	B120	A101	Draft case summary and demand letter for CWB Investment Advisors.	275.00	0.40	110.00
	AKM	B120	A101	Email to Pat Lowe with case summary and draft demand.	275.00	0.10	27.50
	AKM	B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP	B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP	B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/21/2022	AKM	B120	A101	Review of letter from MaRico Tippet counsel.	275.00	0.20	55.00
01/09/2023	GM	B180	A101	Prepare draft Adversary Complaint along with exhibits; Confer with Anna regarding jurisdiction issues; Read J&J Chemical judgment	100.00	4.00	400.00
				For Legal Services Rendered		5.30	870.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.50	\$500.00	\$250.00
Anna K. MacFarlane	0.80	275.00	220.00
Gaurav Mankotia	4.00	100.00	400.00

Lowe, Pat

Statement No. 232027

Account No 1934.048

Claims against CWB Investment Advisors - Finder

Page: 2

Total Current Work 870.00

Balance Due \$870.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	470.00	0.00
B180	Avoidance Action Analysis	400.00	0.00
B100	Administration	870.00	0.00

Invoices are payable upon receipt.

EXHIBIT D-49

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232028
 Account No. 1934.049

Page: 1

Claims against Dianne McClish - Finder

Fees

				Rate	Hours	
10/24/2022	AKM B120	A101	Draft case summary and demand letter for Dianne McClish.	275.00	0.40	110.00
	AKM B120	A101	Email to Pat Lowe with case summary and draft demand.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/17/2022	AKM B180	A101	Emails regarding Dianne McClish phone call.	275.00	0.30	82.50
11/29/2022	AKM B120	A101	Preparing and mailing letter agreement for McClish settlement.	275.00	0.30	82.50
12/21/2022	AKM B120	A101	Voicemail from Dianne McClish regarding starting payments in January.	275.00	0.10	27.50
			For Legal Services Rendered		1.80	607.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.50	\$500.00	\$250.00
Anna K. MacFarlane	1.30	275.00	357.50

Lowe, Pat

Statement No. 232028

Account No 1934.049

Claims against Dianne McClish - Finder

Page: 2

Total Current Work 607.50

Balance Due \$607.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	525.00	0.00
B180	Avoidance Action Analysis	82.50	0.00
B100	Administration	607.50	0.00

Invoices are payable upon receipt.

EXHIBIT D-50

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232029
 Account No. 1934.050

Page: 1

Claims against Blanchard & Associates - Finder

Fees

				Rate	Hours	
10/24/2022	AKM B120	A101	Draft case summary and demand letter for Blanchard & Associates, Inc.	275.00	0.50	137.50
	AKM B120	A101	Email to Pat Lowe with case summary and draft demand.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
01/01/2023	GM B180	A101	Prepare draft Adversary Complaint along with exhibits.	100.00	4.00	400.00
01/04/2023	AKM B180	A101	Review NDTX local rules and email Randall A. Pulman regarding same.	275.00	0.30	82.50
01/09/2023	AKM B180	A101	Review of draft adversary proceeding.	275.00	1.10	302.50
01/16/2023	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.30	82.50
01/19/2023	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/30/2023	AKM B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.30	82.50
	RAP B180	A104	Review and approval of Plaintiff's			

Lowe, Pat

Statement No. 232029

Account No 1934.050

Page: 2

Claims against Blanchard & Associates - Finder

				Rate	Hours	
			Original Complaint for filing.	500.00	0.30	150.00
01/31/2023	AKM B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
	RAP B180	A104	Review and signature of summons.	500.00	0.20	100.00
			For Legal Services Rendered		8.10	1,752.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	3.10	275.00	852.50
Gaurav Mankotia	4.00	100.00	400.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	25.92
			Total Advances	375.92
			Total Current Work	2,128.42

Balance Due \$2,128.42

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	375.92
B120	Asset Analysis and Recovery	442.50	0.00
B180	Avoidance Action Analysis	1310.00	0.00
B100	Administration	1,752.50	375.92

Invoices are payable upon receipt.

EXHIBIT D-51

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232030
 Account No. 1934.051

Page: 1

Claims against Azar Parchami - Finder

Fees

				Rate	Hours	
10/21/2022	AKM B120	A101	Conduct research in file regarding Azar Parchami.	275.00	0.20	55.00
10/24/2022	AKM B120	A101	Draft case summary and demand letter for Azar Parchami.	275.00	1.00	275.00
	AKM B120	A101	Email to Pat Lowe with case summary and draft demand.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/28/2022	AKM B180	A101	Begin drafting complaint; conduct relevant legal research regarding finders.	275.00	1.50	412.50
11/29/2022	AKM B180	A101	Continue drafting complaint and conducting relevant legal research regarding finders and securities laws.	275.00	4.80	1,320.00
	AKM B120	A101	Confer with Randall A. Pulman regarding finder complaint.	275.00	0.30	82.50
11/30/2022	AKM B180	A101	Continue drafting complaint per Randall A. Pulman comments and edits.	275.00	2.00	550.00
12/05/2022	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits;			

Lowe, Pat

Statement No. 232030

Account No 1934.051

Page: 2

Claims against Azar Parchami - Finder

					Rate	Hours	
				send to Pat Lowe for review.	275.00	0.50	137.50
12/06/2022	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.60	165.00
12/07/2022	AKM	B180	A101	Continue drafting adversary complaint per RAP comments and edits.	275.00	0.40	110.00
12/08/2022	RAP	B180	A104	Review, approve and signature of complaint.	500.00	0.30	150.00
01/17/2023	AKM	B180	A101	Review letter received in mail from Defendant and confer with team regarding same.	275.00	0.20	55.00
01/18/2023	AKM	B180	A101	Review of Answer filed by Defendant, pro se and confer with Randall A. Pulman regarding same.	275.00	0.30	82.50
	RAP	B120	A101	Confer with Anna MacFarlane regarding defendant's answer to complaint.	500.00	0.20	100.00
01/25/2023	AKM	B180	A101	Attention to scheduling order deadlines and issues.	275.00	0.30	82.50
				For Legal Services Rendered		13.30	3,882.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	12.30	275.00	3,382.50

Advances

12/07/2022	B110	E124	Pay.gov - Filing fee for Adversary Complaint	350.00
			Total Advances	350.00
			Total Current Work	4,232.50
			Balance Due	<u>\$4,232.50</u>

Lowe, Pat

Statement No. 232030

Account No 1934.051

Page: 3

Claims against Azar Parchami - Finder

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	817.50	0.00
B180	Avoidance Action Analysis	3065.00	0.00
B100	Administration	3,882.50	350.00

Invoices are payable upon receipt.

EXHIBIT D-52

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232031
 Account No. 1934.052

Page: 1

Great Lakes Wealth Management - Finder

Fees

				Rate	Hours	
10/24/2022	AKM B120	A101	Draft case summary and demand letter for Great Lakes Wealth Management.	275.00	0.50	137.50
	AKM B120	A101	Email to Pat Lowe with case summary and draft demand.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
11/02/2022	AKM B120	A101	Telephone calls with Larry Olson regarding demand letter.	275.00	0.20	55.00
	AKM B180	A101	Confer with Randall A. Pulman regarding telephone call with Larry Olson.	275.00	0.10	27.50
11/03/2022	AKM B120	A101	Drafting letter agreement for payment plan.	275.00	1.90	522.50
11/08/2022	AKM B120	A101	Attention to finalizing letter agreement for Randall A. Pulman signature.	275.00	0.20	55.00
11/10/2022	AKM B120	A101	Finalizing letter agreement for mailing.	275.00	0.10	27.50
12/01/2022	AKM B120	A101	Phone call with Larry Olson.	275.00	0.20	55.00
	AKM B120	A101	Confer with Randall A. Pulman regarding phone call with Larry Olson.	275.00	0.10	27.50
	RAP B120	A101	Confer with Anna MacFarlane regarding			

Lowe, Pat

Statement No. 232031

Account No 1934.052

Page: 2

Great Lakes Wealth Management - Finder

				Rate	Hours	
			phone call with Larry Olson.	500.00	0.10	50.00
12/28/2022	AKM B120	A101	Voicemails (0.2) and telephone call (0.1) with Larry Olson.	275.00	0.30	82.50
	AKM B120	A101	Amending letter agreement for repayment of transfers.	275.00	0.20	55.00
	AKM B120	A101	Confer with Randall A. Pulman regarding amendment to letter agreement.	275.00	0.10	27.50
	RAP B120	A101	Confer with Anna MacFarlane regarding Letter Agreement.	500.00	0.10	50.00
12/29/2022	AKM B120	A101	Finalizing letter agreement for mailing.	275.00	0.10	27.50
			For Legal Services Rendered		4.90	1,505.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.70	\$500.00	\$350.00
Anna K. MacFarlane	4.20	275.00	1,155.00

Total Current Work 1,505.00

Balance Due \$1,505.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	1477.50	0.00
B180	Avoidance Action Analysis	27.50	0.00
B100	Administration	1,505.00	0.00

Invoices are payable upon receipt.

EXHIBIT D-53

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232032
 Account No. 1934.053

Page: 1

Claims against Domonic Cotton - Finder

Fees

				Rate	Hours	
10/24/2022	AKM B120	A101	Draft case summary and demand letter for Domonic Cotton.	275.00	0.60	165.00
	AKM B120	A101	Email to Pat Lowe with case summary and draft demand.	275.00	0.10	27.50
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
01/10/2023	GM B180	A101	Prepare draft Adversary Complaint along with exhibits.	100.00	4.00	400.00
01/11/2023	AKM B180	A101	Review of adversary complaint.	275.00	0.90	247.50
01/12/2023	AKM B180	A101	Continue drafting adversary proceeding complaint.	275.00	0.40	110.00
01/16/2023	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/19/2023	AKM B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/30/2023	AKM B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.40	110.00
	AKM B180	A101	Conduct legal research regarding venue			

Lowe, Pat

Statement No. 232032

Account No 1934.053

Page: 2

Claims against Domonic Cotton - Finder

					Rate	Hours	
				and jurisdiction and confer with Randall A. Pulman regarding same.	275.00	0.50	137.50
	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
	RAP	B120	A101	Confer with Anna MacFarlane regarding venue and jurisdiction.	500.00	0.20	100.00
01/31/2023	AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
				For Legal Services Rendered		8.80	1,990.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.20	\$500.00	\$600.00
Anna K. MacFarlane	3.60	275.00	990.00
Gaurav Mankotia	4.00	100.00	400.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	12.72
			Total Advances	362.72

Total Current Work 2,352.72

Balance Due \$2,352.72

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	362.72
B120	Asset Analysis and Recovery	570.00	0.00
B180	Avoidance Action Analysis	1420.00	0.00
B100	Administration	1,990.00	362.72

Invoices are payable upon receipt.

EXHIBIT D-54

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232033
 Account No. 1934.054

Page: 1

Claims against Fleming Financial Services Inc - Finder

Fees

				Rate	Hours	
10/19/2022	AKM B120	A101	Draft demand and case summary for Fleming Financial Services et al.	275.00	1.00	275.00
	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
	AKM B120	A101	Email to Pat Lowe with draft case summary and demand for review and approval.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
10/27/2022	AKM B120	A101	Confer with Randall A. Pulman regarding Flemings.	275.00	0.30	82.50
10/31/2022	AKM B120	A101	Confer with Randall A. Pulman regarding resending letter to John Schaub after letter returned.	275.00	0.10	27.50
	AKM B120	A101	Preparing letter to be re-sent to John Schaub.	275.00	0.10	27.50
	RAP B120	A101	Confer with Anna MacFarlane regarding letter to John Schaub.	500.00	0.10	50.00
11/14/2022	AKM B120	A101	Review of returned mail and addresses on demand letter - OK because spoke with attorney.	275.00	0.10	27.50
	AKM B120	A101	Call with Randall A. Pulman and plaintiff's lawyer regarding Fleming			

Lowe, Pat

Statement No. 232033

Account No 1934.054

Page: 2

Claims against Fleming Financial Services Inc - Fin

					Rate	Hours	
				Financial arbitration.	275.00	0.30	82.50
	AKM	B120	A101	Call with attorney regarding Flemings.	275.00	0.10	27.50
	AKM	B120	A101	Confer with Randall A. Pulman regarding attorney phone call.	275.00	0.10	27.50
	RAP	B180	A107	Telephone conference with Plaintiff's counsel regarding arbitration hearing; office conference with A. MacFarlane regarding settlement discussions; offer 10% discount.	500.00	0.50	250.00
11/15/2022	AKM	B120	A101	Email to opposing counsel regarding potential settlement.	275.00	0.20	55.00
12/21/2022	GM	B180	A101	Prepare adversary complaint along with annexures.	100.00	3.00	300.00
12/22/2022	AKM	B180	A101	Review of adversary complaint.	275.00	0.50	137.50
01/13/2023	AKM	B180	A101	Continue drafting adversary proceeding complaint.	275.00	1.10	302.50
	AKM	B180	A101	Emails with Randall A. Pulman regarding edits to complaint.	275.00	0.20	55.00
	RAP	B180	A108	Review and edit of Plaintiff's Original Petition.	500.00	0.50	250.00
01/16/2023	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/19/2023	AKM	B180	A101	Continue drafting adversary complaint per Randall A. Pulman comments and edits.	275.00	0.20	55.00
01/30/2023	AKM	B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.80	220.00
	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
01/31/2023	AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
				For Legal Services Rendered		10.80	2,917.50

Lowe, Pat

Statement No. 232033

Account No 1934.054

Claims against Fleming Financial Services Inc - Fin

Page: 3

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	2.10	\$500.00	\$1,050.00
Anna K. MacFarlane	5.70	275.00	1,567.50
Gaurav Mankotia	3.00	100.00	300.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	38.88
			Total Advances	388.88

Total Current Work 3,306.38

Balance Due \$3,306.38

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	388.88
B120	Asset Analysis and Recovery	987.50	0.00
B180	Avoidance Action Analysis	1930.00	0.00
B100	Administration	2,917.50	388.88

Invoices are payable upon receipt.

EXHIBIT D-55

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232034
 Account No. 1934.055

Page: 1

Claims against Gregory Talbot - Finder

Fees

				Rate	Hours	
10/19/2022	AKM B120	A101	Draft demand and case summary for Gregory Talbot (Finder).	275.00	0.30	82.50
	AKM B120	A101	Email to Pat Lowe with draft case summary and demand for review and approval.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.20	100.00
10/20/2022	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
12/26/2022	GM B180	A101	Prepare adversary complaint along with annexures.	100.00	4.00	400.00
12/29/2022	AKM B180	A101	Review of draft adversary proceeding.	275.00	0.70	192.50
01/05/2023	GM B180	A101	Confer with Anna regarding adversary complaint; review and edit adversary complaint after comments.	100.00	0.20	20.00
01/13/2023	AKM B180	A101	Continue drafting adversary proceeding complaint.	275.00	0.70	192.50
01/30/2023	AKM B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.30	82.50

Lowe, Pat

Statement No. 232034

Account No 1934.055

Page: 2

Claims against Gregory Talbot - Finder

					Rate	Hours	
01/31/2023	RAP	B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
	AKM	B180	A101	Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
	RAP	B180	A104	Review and signature of summons.	500.00	0.20	100.00
				For Legal Services Rendered		7.60	1,580.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	2.40	275.00	660.00
Gaurav Mankotia	4.20	100.00	420.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	12.96
			Total Advances	362.96

Total Current Work 1,942.96

Balance Due \$1,942.96

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	362.96
B120	Asset Analysis and Recovery	387.50	0.00
B180	Avoidance Action Analysis	1192.50	0.00
B100	Administration	1,580.00	362.96

Invoices are payable upon receipt.

EXHIBIT D-56

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232035
 Account No. 1934.056

Page: 1

Claims against Jack Nace - Finder

Fees

				Rate	Hours	
10/19/2022	AKM B120	A101	Draft demand and case summary for Jack Nace (Finder).	275.00	0.40	110.00
	AKM B120	A101	Email to Pat Lowe with draft case summary and demand for review and approval.	275.00	0.10	27.50
	RAP B120	A104	Review and approval of case summary sheet; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
	RAP B120	A104	Review, approval and signature of demand letter.	500.00	0.30	150.00
10/20/2022	AKM B120	A101	Finalizing demand for signature and mailing.	275.00	0.10	27.50
12/28/2022	GM B180	A101	Prepare adversary complaint along with annexures	100.00	4.00	400.00
12/29/2022	AKM B180	A101	Review of draft adversary proceeding.	275.00	0.50	137.50
01/05/2023	GM B180	A101	Confer with Anna regarding adversary complaint; review and edit adversary complaint after comments.	100.00	0.20	20.00
01/30/2023	AKM B180	A101	Continue drafting adversary complaint per Leslie S. Hyman comments and edits.	275.00	0.20	55.00
	RAP B180	A104	Review and approval of Plaintiff's Original Complaint for filing.	500.00	0.30	150.00
01/31/2023	RAP B180	A104	Review and approval of Plaintiff's			

Lowe, Pat

Statement No. 232035

Account No 1934.056

Page: 2

Claims against Jack Nace - Finder

			Rate	Hours	
		Original Complaint for filing.	500.00	0.30	150.00
AKM	B180	A101 Final review of adversary proceeding complaint for filing.	275.00	0.20	55.00
RAP	B180	A104 Review and signature of summons.	500.00	0.20	100.00
		For Legal Services Rendered		7.10	1,532.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.40	\$500.00	\$700.00
Anna K. MacFarlane	1.50	275.00	412.50
Gaurav Mankotia	4.20	100.00	420.00

Advances

01/31/2023	B110	E124	Pay.gov - US Bankruptcy Court #03964G	350.00
01/31/2023	B110	E108	Postage - PCP	12.72
			Total Advances	362.72
			Total Current Work	1,895.22

Balance Due \$1,895.22

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	362.72
B120	Asset Analysis and Recovery	465.00	0.00
B180	Avoidance Action Analysis	1067.50	0.00
B100	Administration	1,532.50	362.72

Invoices are payable upon receipt.

EXHIBIT D-57

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232036
 Account No. 1934.057

Page: 1

Collection of G-Force Technical Judgment

Fees

					Rate	Hours	
12/06/2022	MS	B120	A103	Draft/revise post-judgment Requests for Production and Interrogatories; confer with Mr. Pulman regarding same.	275.00	3.00	825.00
	RAP	B120	A101	Confer with Marshall Swanson regarding post judgement production.	500.00	0.20	100.00
12/07/2022	MS	B120	A103	Draft/revise Continued preparation of post-judgment Requests for Production and Interrogatories; email exchange with counsel regarding same.	275.00	0.80	220.00
12/12/2022	MS	B120	A103	Draft/revise post-judgment Requests for Production and Interrogatories; email exchange with co-counsel regarding same.	275.00	0.70	192.50
	RAP	B190	A104	Review of post judgment discovery; instructions to staff to convert to a 2004 examination.	500.00	0.30	150.00
12/15/2022	MS	B120	A103	Draft/revise post-judgment Requests for Production.	275.00	0.20	55.00
12/21/2022	MS	B120	A103	Draft/revise post-judgment Requests for Production.	275.00	0.20	55.00
01/04/2023	MS	B120	A103	Draft/revise Notice of Rule 2004 Exam and Subpoena Duces Tecum.	275.00	0.80	220.00
01/05/2023	MS	B120	A103	Draft/revise Notice of Rule 2004 Exam and Subpoena Duces Tecum.	275.00	0.80	220.00

Lowe, Pat

Statement No. 232036

Account No 1934.057

Page: 2

Collection of G-Force Technical Judgment

	Rate	Hours	
For Legal Services Rendered		7.00	2,037.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.50	\$500.00	\$250.00
Marshall Swanson	6.50	275.00	1,787.50

Total Current Work	2,037.50
--------------------	----------

Balance Due	<u>\$2,037.50</u>
--------------------	--------------------------

Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B120 Asset Analysis and Recovery	1887.50	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	150.00	0.00
B100 Administration	2,037.50	0.00

Invoices are payable upon receipt.

EXHIBIT D-58

**No fees or
expenses in this
matter**

EXHIBIT D-59

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

2161 NW Military Highway, Suite 400
 San Antonio, Texas 78213
 Telephone: (210) 222-9494
 Telecopier: (210) 892-1610
 www.pulmanlaw.com

Office Locations:
 San Antonio
 Dallas/Fort Worth
 McAllen

Lowe, Pat
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

January 31, 2023

Invoice No. 232037
 Account No. 1934.059

Page: 1

Claims against American Express Company

Fees

				Rate	Hours	
10/18/2022	AKM B120	A101	Review relevant documents regarding American Express adversary.	275.00	0.80	220.00
10/24/2022	AKM B120	A101	Review and analyze documents in file and conduct legal research regarding AMEX lawsuit.	275.00	3.20	880.00
10/25/2022	AKM B120	A101	Continue reviewing and analyzing documents in file and conducting relevant legal research regarding lawsuit against Amex.	275.00	3.20	880.00
	AKM B120	A101	Confer with Randall A. Pulman regarding Amex lawsuit.	275.00	0.40	110.00
	RAP B120	A101	Confer with Anna MacFarlane regarding Amex lawsuit	500.00	0.40	200.00
10/27/2022	AKM B180	A101	Begin reviewing American Express statements to categorize expenditures.	275.00	4.40	1,210.00
	AKM B180	A101	Conducting legal research regarding fraudulent transferee mere conduit defense.	275.00	3.00	825.00
10/28/2022	AKM B120	A101	Continue legal research regarding fraudulent transferee mere conduit defense.	275.00	4.20	1,155.00
10/31/2022	AKM B180	A101	Email to Greg Murray regarding Amex statements.	275.00	0.30	82.50

Lowe, Pat

Statement No. 232037

Account No 1934.059

Page: 2

Claims against American Express Company

				Rate	Hours	
11/21/2022	AKM B120	A101	Confer with W. Drew Mallender regarding AmEx.	275.00	0.30	82.50
	WDM B190	A104	Legal research in support of complaint against Mueller. Review and analysis of forensic accountant report, bank statements, and AMEX transfers.	375.00	3.60	1,350.00
	WDM B190	A105	Meet with Ann MacFarlane regarding Amex transfers, relevant legal research.	375.00	0.30	112.50
12/08/2022	RAP B190	A104	Review and edit of Plaintiff's Original Complaint; office conference with D. Mallender and A. MacFarlane regarding same; final approval for filing.	500.00	2.00	1,000.00
	WDM B190	A103	Draft/revise Complaint against American Express.	375.00	5.50	2,062.50
	AKM B190	A101	Confer with Randall A. Pulman and W. Drew Mallender regarding complaint.	275.00	0.30	82.50
	WDM B190	A101	Confer with Randall A. Pulman and Anna MacFarlane regarding complaint.	375.00	0.30	112.50
	AKM B190	A101	Drafting AmEx complaint exhibits and researching service issues; confer with Randall A. Pulman and W. Drew Mallender regarding same.	275.00	0.90	247.50
12/28/2022	AKM B190	A101	Correspondence with AmEx counsel (0.2); confer with Randall A. Pulman regarding same (0.1).	275.00	0.30	82.50
	RAP B190	A107	Review of e-mail regarding receipt of complaint and extension of answer date; office conference with A. MacFarlane regarding same.	500.00	0.30	150.00
01/03/2023	AKM B190	A101	Review of email from AmEx counsel.	275.00	0.10	27.50
	AKM B190	A101	Updating stipulation prepared by AmEx counsel.	275.00	0.20	55.00
	AKM B190	A101	Review file for AmEx document request.	275.00	2.00	550.00
	AKM B190	A101	Confer with Randall A. Pulman regarding document request and stipulation.	275.00	0.30	82.50
01/04/2023	AKM B190	A101	Assembling document request response to AmEx in NetDocuments; emails with opposing counsel regarding same.	275.00	<u>2.00</u>	<u>550.00</u>

Lowe, Pat

Statement No. 232037

Account No 1934.059

Page: 3

Claims against American Express Company

	Rate	Hours	
For Legal Services Rendered		38.30	12,110.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	2.70	\$500.00	\$1,350.00
W. Drew Mallender	9.70	375.00	3,637.50
Anna K. MacFarlane	25.90	275.00	7,122.50

Advances

12/08/2022	B110	E124	Pay.gov - Texas Western Bankruptcy Court ID #A23363452	350.00
12/12/2022	B110	E106	SOS Texas	7.19
			Total Advances	357.19

Total Current Work	12,467.19
--------------------	-----------

Balance Due	<u>\$12,467.19</u>
--------------------	---------------------------

Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	0.00	357.19
B120 Asset Analysis and Recovery	3527.50	0.00
B180 Avoidance Action Analysis	2117.50	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	6465.00	0.00
B100 Administration	12,110.00	357.19

Invoices are payable upon receipt.

EXHIBIT E

Defendant(s)	Case Number	Amt of claim	Category of Defendant	Complaint Filed Date
Agent Advisory Group, LLC and Dennis Wirth	22-05095	\$406,839.55	Finder	12/7/2022
George Villa	22-05094	\$28,000.00	Finder	12/7/2022
Hollie Gandy and Safe Money Solutions	22-05093	\$43,500.00	Finder	12/7/2022;amended 12/22/2022
RD&J, Inc. and Roger Jones	22-05092	\$32,500.00	Finder	12/7/2022
Purpose Driven Financial, Zaheer Razack, and Stuart Hunsicker	22-05091	\$43,500.00	Finder	12/7/2022
Pamela Hopman, PGH Advisors, LLC, The Hopman Group, LLC, MaRico Tippet	22-05090	\$776,634.51	Finder	12/7/2022
Azar Parchami	22-05089	\$26,000.00	Finder	12/7/2022
Wiley Carter and Metropolitan CMG, LLC	22-05088	\$57,500.00	Finder	12/7/2022
McNamara Capital Investment Group, LLC and John J. McNamara	22-05087	\$896,959.96	Finder	12/7/2022
INF Solutions, LLC, Scott Milbourne, Raphael Vallier	22-05086	\$555,115.91	Finder	12/7/2022
Financial Horizon, Paul Burke, Brad Farrar, Jacquelin Farrar	22-05085	\$818,596.30	Finder	12/7/2022
Michael Cales	22-05084	\$74,500.00	Finder	12/7/2022
Jack Nace II	23-05026	\$137,917.44	Finder	1/31/2023
Gregory Talbot	23-05025	\$74,000.00	Finder	1/31/2023
Fleming Financial Services, Inc., Sean Fleming, Nancy Fleming	23-05024	\$210,772.80	Finder	1/31/2023
Domonic Cotton	23-05023	\$22,238.13	Finder	1/31/2023
Blanchard & Associates, Inc., and Hunter Blanchard	23-05022	\$6,500.00	Finder	1/31/2023
Senior Insurance Services, Inc., Spencer Rudd, Janet Rudd	23-05021	\$37,062.46	Finder	1/31/2023
Scott Louis Nazarino	23-05020	\$69,000.00	Finder	1/31/2023
Steven Fortier	23-05019	\$42,250.00	Finder	1/31/2023
Shantell Wright	23-05018	\$22,238.13	Finder	1/31/2023

Agents Insurance Sales & Services, Inc., Savings Options and Solutions, Inc., Barry Lynn Wilken, David Thomas Obmann	23-05017	\$34,300.00	Finder	1/31/2023
Crissman Scott Crombie	23-05016	\$45,750.00	Finder	1/31/2023
David Rosen	23-05015	\$48,300.00	Finder	1/31/2023
Raul T Gomez	23-05014	\$60,754.50	Finder	1/31/2023
Randy Seymour	23-05013	\$58,790.00	Finder	1/31/2023
Premier Group Enterprises, LLC and Anthony Lotts	23-05012	\$25,142.66	Finder	1/31/2023
Mark Zabinski	23-05011	\$229,384.07	Finder	1/31/2023
John Vizio	23-05010	\$111,808.19	Finder	1/31/2023
Jacob Proulx	23-05009	\$93,500.00	Finder	1/31/2023
Fidelity Mutual Financial Planning, LLC and Darryl Stein	23-05008	\$265,382.84	Finder	1/31/2023
GM Consultants Group, Inc., Gregory Minear, and Shelley Minear	23-05007	\$328,617.04	Finder	1/31/2023
Financial Partners of America, LLC and Jonmark Richardson	23-05006	\$450,450.00	Finder	1/31/2023
TOTAL		\$6,133,804.49		